

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ARLENE DELGADO,

Plaintiff,

No. 19-cv-11764

- against -

DONALD J. TRUMP FOR PRESIDENT,
INC., SEAN SPICER, individually,
REINCE PRIEBUS, individually,
and STEPHEN BANNON, individually,
Defendants.

VIDEOTAPED DEPOSITION OF SEAN M. SPICER
(Conducted via videoconference)

DATE: JULY 17, 2023

TIME: 9:03 a.m. - 12:05 p.m.

PURSUANT TO: Notice by counsel for
Plaintiff for purposes of
discovery, use at trial or
such other purposes as are
permitted under the Florida
Rules of Civil Procedure
REPORTED BY: Lee Ann Reid, Registered
Professional Reporter,
Notary Public, State of
Florida

Pages 1 - 103

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8
ALSO PRESENT: Arlene Delgado
9 Catherine Halsema, Paralegal,
Phillips, Hunt, Walker & Hanna
10 Alan Pokotilow, Videographer

11 I N D E X

12 DIRECT EXAMINATION BY MR. PHILLIPS	Page 4
13 CERTIFICATE OF OATH	Page 100
14 REPORTER'S CERTIFICATE	Page 101
15 ERRATA PAGE	Page 102
16 READ AND SIGN LETTER	Page 103

17 E X H I B I T S

(None)

1 THE VIDEOGRAPHER: Good morning. We are
2 going on the record at 9:03 a.m. Today is Monday
3 July 17 of 2023. We are here today in Middletown,
4 Rhode Island for the video recorded deposition of
5 Sean Spicer in the matter of Arlene Delgado versus
6 Donald J. Trump For President, Incorporated, Sean
7 Spicer individually, Reince Priebus, individually,
8 and Stephen Bannon individually. Civil case
9 No. 19-cv-11764, to be heard before the United
10 States District Court, Southern District of New
11 York.

12 My name is Alan Pokotilow and I'm a forensic
13 videographer today here on behalf of Veritext
14 Legal Solutions. Our court reporter today is Lee
15 Ann Reid, also here today on behalf of Veritext
16 Legal Solutions.

17 Please note that this deposition is being
18 conducted virtually. Quality of recording depends
19 upon the quality of camera and internet connection
20 of participants. What is observed from the
21 witness and audible on screen is what will be
22 recorded. Audio and video recording will continue
23 to take place until all parties have agreed to go
24 off the record.

25 Will counsel please state your name and

1 affiliations for the record, after which our court
2 reporter will swear the witness and we can
3 proceed.

4 MR. PHILLIPS: John Phillips, attorney for
5 Ms. Delgado.

6 MR. BLUMETTI: Jared Blumetti of LaRocca,
7 Hornik, Rosen & Greenberg on behalf of Mr. Spicer.

8 (At this juncture, the witness was sworn.)

9 SEAN M. SPICER,
10 the witness herein, being first duly sworn on oath, was
11 examined and deposed as follows:

12 DIRECT EXAMINATION

13 BY MR. PHILLIPS:

14 Q. Good morning, Mr. Spicer.

15 A. Good morning.

16 Q. So you have had a lot of questions asked of
17 you over your career. Have you ever given a deposition
18 before?

19 A. So I faced a bunch of questions before the
20 Mueller probe. I don't know legally, I'll leave that
21 up to you whether that was a deposition or an
22 investigation, but that was the extent of my
23 interaction with having any kind of legal questioning.

24 Q. Okay. Fair enough. So a deposition is a
25 little different than a press conference or a normal

1 conversation. And maybe your attorney has explained
2 this to you, maybe not, but I want to have it on the
3 record.

4 What we're dealing with is a court reporter
5 sitting in a room typing down everything you and I say,
6 and a judge or jury is going to review that at some
7 point or the relevant portions thereof. Therefore,
8 I've got to ask comprehensible, full questions and then
9 give you a chance to answer or explain to me why my
10 question was terrible and you didn't understand it.

11 My job is to get through this without any
12 crazy screaming and shouting and bluster, ask you the
13 questions we've got to ask you, do my job, and ask you
14 questions that you understand and can respond to. Is
15 that fair?

16 A. That's very fair. Much better than a press
17 conference.

18 Q. It is, sir. And my role here today is to,
19 like I said, ask you questions, and will you agree with
20 me that if you don't understand a question, you will
21 let me know?

22 A. Fair.

23 Q. Okay. And if you answer a question, I'm fair
24 to assume that you understood it?

25 A. Fair.

1 Q. Okay. Yeses and noes are better than uh-huhs
2 and uh-uhs or head nods for purposes of the written
3 record. Certainly we can go back and look at the Zoom
4 feed, but yeses and noes are preferred by a court.

5 It's not a test of duration. If you need to
6 take a break, you know, let me know. I don't quite
7 know the length of today. Kind of depends on what you
8 know and what you were involved in, because I know you
9 kind of came in relatively later in the process and had
10 a limited duration in, you know, the scheme of things,
11 but we'll -- you know, we'll get through it.

12 That said, I always start with please state
13 your full name for the record.

14 A. Sean Michael Spicer.

15 Q. Mr. Spicer, where are you currently employed?

16 A. I currently own an LLC called RigWil.

17 Q. What is RigWil?

18 A. It's a consulting firm.

19 Q. Okay. Is the Trump campaign or the Trump
20 family a client of yours?

21 A. No.

22 Q. Okay. Have they been?

23 A. No.

24 Q. Okay. You know, kind of short answer, what
25 does RigWil do? What type of services does it offer?

1 A. We offer consulting services to companies and
2 C-Suite executives. It's also a holding company for
3 production and marketing that is done on my behalf
4 whether it's -- so if there's a deal that -- like my
5 most recent book deal ran through RigWil, so any of my
6 personal business dealings runs through the LLC.

7 Q. Sure. Got it. What was your last employment
8 before RigWil?

9 A. Well, to be clear, RigWil has been in
10 business since 2018. I last received a W-2, which is
11 what I believe you're getting at, from Newsmax Media.

12 Q. Okay. How long were you with Newsmax Media?

13 A. Approximately three years.

14 Q. And what did you do for Newsmax Media?

15 A. I hosted an evening television show called
16 Spicer & Co.

17 Q. Okay. And what did you do before Newsmax
18 Media?

19 A. As I stated earlier, RigWil has been set up
20 since 2018 and has had various clients and
21 opportunities that have gone through them.

22 Q. Okay. Fair enough. I'm just going to assume
23 a concurrent employment or concurrent business
24 situation with RigWil. But I just kind of want to
25 chronologically, in reverse order, go back through your

1 career.

2 A. Okay.

3 Q. Eventually, we're going to get to Trump world
4 and that's -- you know, or the White House. And that's
5 where I think we're headed next. So where did you
6 work -- besides the concurrent RigWil work, I guess,
7 where did you work prior to Newsmax?

8 A. Again, I think I have answered the question.
9 I have had a concurrent consulting firm since 20 -- I
10 would have to check the records. It was either late
11 2017 or early 2018, and that's where all business
12 flowed through.

13 I also -- I'm sorry. One other thing is that
14 I am a partner in a firm called Point 1, which is a
15 mail firm, but, again, those funds actually flow
16 through RigWil as well.

17 Q. Okay. At some point you were employed by the
18 United States of America, were you not?

19 A. Correct.

20 Q. Okay. I guess I'm not being clear that I'm
21 just trying to reverse chronologically obtain your
22 employment. And besides RigWil and Newsmax, where else
23 have you been employed in the last five or six years?

24 A. The United States Navy. I'm in the Reserves.
25 So I continue to get a check for services rendered for

1 the last 24 years.

2 Q. Okay. Very good. Thank you for your
3 service. When did you work for the United States?

4 A. As I said, first I have been in the United
5 States Navy for 24 years. That is the United States.
6 I worked for the Executive Office of the President,
7 which I think is what you're getting at, from January
8 21st until the 1st of September of 2017.

9 Q. Okay. Any other employment that we haven't
10 discussed from September 1, 2017 to date?

11 A. To the best of my knowledge, all of my income
12 has flown through the consulting firm. I would have to
13 check tax records to -- it is possible that somebody
14 issued a W-2, but the way things have been structured
15 since 2017, all deals have run through the consulting
16 firm to the best of my recollection.

17 Q. Fair enough. And I'm not trying to really
18 get into any of that, you know. My goal is to kind of
19 stick with 2017, 2018, and kind of hit this Trump
20 period, right? So let me go the other direction. When
21 did you first meet Donald Trump?

22 A. I believe Mr. Trump was a guest at an event
23 that the RNC did in Boca Raton in probably -- I would
24 have to look at a calendar -- 2014, 2015, he showed up.
25 It was a donor reception.

1 Q. And when did you first have business dealings
2 with Mr. Trump?

3 MR. BLUMETTI: Objection to form. You can
4 answer.

5 THE WITNESS: Sometime in the May time period
6 of 2015 when it became apparent -- well, so let me
7 back up one second. I ran all of the debates in
8 the 2015, 2016 cycle. There were plenty of times
9 when Mr. Trump and/or his senior associates would
10 reach out to me regarding an issue or concern they
11 had with a debate. I don't know that that gets to
12 what you're asking, but that's when the
13 relationship sort of became more than just shaking
14 somebody's hand and asking for a picture, and more
15 of a, you know -- but again, it was him calling
16 about concerns with the debate.

17 Then in about May of 2015 when it became
18 obvious that he was the presumptive nominee, I
19 would travel to New York from time to time to help
20 coordinate activities between the Republican
21 National Committee, where I was employed, and the
22 Trump campaign in their role as the leader of the
23 ticket.

24 BY MR. PHILLIPS:

25 Q. Okay. There's going to be a lot of questions

1 today that I'm going to ask simply for background. The
2 answer is going to be obvious, but I'm just trying
3 to -- I'm also the newest one on this case. I'm trying
4 to get an understanding of the people, places, and
5 things involved. And you just happen to be my first
6 deposition, so I'm going to ask you some questions that
7 other people might not wind up having to answer just so
8 that I have it all straight in my head.

9 And then there are going to be some questions
10 that I ask that are very specific to you and your
11 situation. And right now this section in my mental
12 outline is just kind of understanding background and
13 relationships between you, the campaign, Mr. Trump, Ms.
14 Delgado, and to some extent continuing the chronology
15 back, I guess, to the GOP.

16 So I guess my next question is, you know, if
17 you began work for the Executive Office of the
18 President on January 21st, where did you work before
19 that?

20 A. The Republican National Committee.

21 Q. Okay. What was your role with the Republican
22 National Committee?

23 A. I worked for the Republican National
24 Committee for three cycles; each one is two years. For
25 the first two cycles, I was the Communications

1 Director. For the last cycle, which encompasses the
2 2016 election, I was the Chief Strategist and
3 Communications Director.

4 Q. Okay. One of those obvious questions: Did
5 you ever work directly for or as an employee of the
6 Trump campaign?

7 A. No.

8 Q. Did you ever work for or directly as an
9 employee of the Trump transition team?

10 A. On or about December 22nd, I was named --
11 after I was named White House Press Secretary, I was
12 named a senior adviser to the transition team as is
13 required by law.

14 Q. When did you first become aware of or know
15 about AJ Delgado?

16 A. To the best of my recollection, it would be
17 somewhere July, August maybe, of 2016, but it's
18 possible that there was an interaction prior to that.

19 Q. Okay. How? How did you become aware of her,
20 as best as you --

21 A. I believe she did some surrogate work for the
22 campaign, meaning that she would appear on television.
23 So I either saw her on television, read a quote, or
24 something of that nature.

25 Q. Okay. And was -- was Ms. Delgado ever, for

1 lack of a better way to put it, in your chain of
2 command? Was she ever --

3 A. No.

4 Q. Are you aware if you signed a nondisclosure
5 agreement with either the Trump campaign, Trump
6 transition team, or Trump White House?

7 A. I am not. I can't recall.

8 Q. Okay. Are you aware if you signed any NDA
9 whatsoever that included a non-disparage provision
10 covering Donald Trump?

11 A. With respect to the White House, I would have
12 to review those records. I can't remember -- there is
13 a lot of paperwork, as you can imagine.

14 Q. Okay. What have you reviewed in preparation
15 for today?

16 A. A few e-mails, some texts. I believe that
17 might be it.

18 Q. What e-mails and texts did you review?

19 A. I'm not sure which is which. I don't know
20 that it matters, but there was some correspondence
21 around the last week of December that was intended to
22 make sure that I remembered -- kind of had a better
23 handle on the timeline.

24 Q. December of 2016?

25 A. Yes. Yes.

1 Q. Okay.

2 A. Sorry. So to your previous question, I
3 think -- I just want to make sure I'm keeping the years
4 correct. You asked about my interaction with her. I
5 hope I said 2016 and not 2015, but I meant --

6 Q. July, August of 2016.

7 A. Okay. Good.

8 Q. And what was your role in any way related to
9 the campaign, the candidacy, or the administration of
10 Donald Trump in July or August of 2016?

11 MR. BLUMETTI: Objection to form. You can
12 answer.

13 THE WITNESS: I didn't -- I mean, as I
14 stated, I was the Communications Director and
15 Chief Strategist for the committee. I helped
16 coordinate activities and messaging from the top
17 of the ticket, which would have been the President
18 of the United States, who in August of that year
19 became the nominee. But I didn't have any -- I
20 forgot how you phrased the question. I didn't
21 have any direct responsibility. It was a
22 coordination role.

23 BY MR. PHILLIPS:

24 Q. Does the RNC assist in -- or I guess
25 specifically did the RNC assist with helping staff

1 either the Trump campaign, transition team, or White
2 House?

3 MR. BLUMETTI: Objection to form.

4 THE WITNESS: Jared, am I --

5 MR. BLUMETTI: Yes, Sean. You answer
6 everything unless I tell you not to answer.

7 THE WITNESS: Okay.

8 MR. BLUMETTI: I'm just preserving an
9 objection for the record.

10 THE WITNESS: Okay. Counsel, can you repeat
11 the way you phrased that?

12 BY MR. PHILLIPS:

13 Q. Certainly. What I'm trying to understand --
14 I'm going to ask generally and then specifically. But
15 what I want to understand is what role, if any, does
16 the RNC have with staffing a campaign at that -- at
17 that juncture, right?

18 A. So the RNC doesn't have a role in staffing.
19 The RNC supports the nominee. So that being said,
20 there are times in which the nominee may look at a
21 staffer who happens to be employed by the RNC and say
22 we would like to put them on our payroll for a variety
23 of reasons that change from cycle to cycle, candidate
24 to candidate. The RNC doesn't have a role. It
25 supports the nominee. So it will do things, as you can

1 imagine, in the same way as any field. When you
2 interact with folks, you may say we would love them on
3 our team.

4 That clearly happens, but it's not the RNC's
5 doing. It's the candidate, over history -- and I have
6 been there two cycles -- that will often want a
7 particular individual to be on their payroll for a
8 variety of reasons.

9 Q. Did you make any recommendations to Mr. Trump
10 or his campaign related to placement of employees?

11 A. At what time period?

12 Q. July -- mid-to-late 2016.

13 A. Just so we're clear on the role, I would
14 never have wanted to lose staff. So I was never in the
15 ballpark of, that I can recall, of offering people.
16 There were times when I would be asked my opinion, we'd
17 like this person. Do you think they're good, or do you
18 recommend them? And I would offer my recommendation.
19 So to that extent, yes.

20 But generally speaking, I didn't offer
21 people. Again, remember there is a big difference
22 between offering people for employment and providing
23 the historical role that RNC plays in terms of
24 coordination support.

25 Q. Right. But I assume -- and again, I haven't

1 been there, you know. I worked for Sonny Callahan on
2 the Hill for a summer and that's about the extent of my
3 experience. Rest in peace, Sonny. But I don't know
4 how it goes. I know eventually there's an election
5 day, and I imagine upon election day there's a lot of
6 people that want jobs in the White House. Am I wrong
7 about that?

8 MR. BLUMETTI: Objection to form. You can
9 answer.

10 THE WITNESS: Well, if you win, yes.

11 BY MR. PHILLIPS:

12 Q. Okay. If the party -- if the RNC is
13 successful, you have placed a Republican candidate, and
14 there's going to be, certainly, an expanse in staff
15 from what a campaign would have.

16 MR. BLUMETTI: Objection to form.

17 THE WITNESS: So again, there's two parts to
18 your question. The RNC doesn't win. The
19 candidate wins.

20 BY MR. PHILLIPS:

21 Q. Certainly.

22 A. When -- there's actually -- and then, again,
23 with respect to jobs, there's two pots of jobs:
24 There's White House jobs and presidential appointed,
25 which are often called Schedule C jobs. The RNC

1 doesn't have much input at all. It's the individual
2 who would assume that job after they're sworn into
3 office on January 21st. So it doesn't matter
4 necessarily where they come from. I'm sure that there
5 are recommendations, but the campaign would drive the
6 train on that.

7 Q. Okay. Did you -- I guess, were you involved
8 with any aspect of the hiring and firing of White House
9 staff or appointments before January 21, 2017?

10 A. I was asked to make recommendations --

11 Q. Okay.

12 A. -- for one particular office.

13 Q. And what was that?

14 A. The press office.

15 Q. Okay. Tell me about that.

16 A. Prior to being named White House Press
17 Secretary, I was asked to help create a list of names
18 to fulfill potential jobs and submit that up the chain,
19 if you will. I did that. And then after being sworn
20 in on January 21st, once I became an employee, then I
21 began to execute some of that list.

22 Q. Going back to some general questions that
23 you're going to be, like, of course you know the answer
24 to this. But it's one of those dumb questions that I'm
25 going to ask and then take down a path. What is Comms?

1 A. Shorthand for communications.

2 Q. Okay. And what does Comms do, to the extent
3 you know, in a campaign?

4 A. In a traditional campaign, communications
5 executes the messaging and various means of
6 communications to various audiences.

7 Q. What does Comms do in a successful campaign?
8 I know it as transition. I know, you know, if that's
9 not what it's called, then let me know; but that period
10 before, you know, where you have a campaign that won in
11 November, but hasn't taken office yet. What does Comms
12 do in that interim for a successful candidate?

13 A. It would communicate the policy, the people,
14 and events of the transition to the media and the
15 American public.

16 Q. Okay. And then what does Comms do for -- you
17 know, once somebody's elected, what is the role of
18 Comms?

19 A. Well, just to be clear, I think there's a big
20 difference between a regular elected official and the
21 White House. The White House delineates the
22 Communications Office from the Press Office. The
23 Communications Office in the White House deals much
24 more with what I would say long-term issues. Anything
25 outside basically the 24-hour window, the Press Office

1 is dealing with. It's dealing in the moment. There's
2 obviously exceptions to this. A lot of it has to do
3 with the relationships and the personnel and how they
4 divvy up some things, but generally speaking, the Press
5 Office is living in the moment of incoming and
6 immediately outgoing media inquiries.

7 Q. Okay. And that's what I want to understand
8 for purposes of this -- kind of this little few minutes
9 of questions. You were Press Secretary. And how
10 does -- I guess, how does the Press Secretary side and
11 Comms -- are they different departments? Is one over
12 another? Help me understand the structure there,
13 please.

14 A. So I think, again, a little of it varies over
15 time in terms of how various White Houses have
16 structured it. A lot of it is personality driven and
17 relationship driven, meaning that on paper they might
18 appear the same. Both positions have historically been
19 assistance to the President; Communications Director
20 and the Press Secretary. But again, you can go back
21 through history, various parties, just the
22 relationships that exist between the press secretary
23 and the communications director and some of what they
24 divvy up.

25 But generally speaking, as I said, the press

1 secretary is dealing with events and issues that happen
2 in the moment; briefings, media inquiries. The
3 communications staff and specifically the
4 communications director is looking long term, beyond 24
5 hours. Trips, events, policy rollouts, pronouncements,
6 et cetera.

7 Q. Do you know how AJ Delgado came to be a
8 surrogate of or employed by the campaign?

9 A. No.

10 Q. Do you know how AJ Delgado became, to the
11 extent she was, a surrogate or employee of the
12 transition team?

13 A. No.

14 Q. Okay. Did you consider -- so what was
15 your -- I guess, let me back it up. We have got this
16 division that you have explained to some extent between
17 communications and press. Who were you responsible --
18 as of January 21, 2017, who were you responsible for
19 hiring and firing?

20 A. Everybody in both of those categories.

21 Q. Okay. Who is Jason --

22 A. Just can I step back, sir?

23 Q. Yes, sir.

24 A. Just to be clear, hiring is a very
25 interesting word. I know why you used it just in terms

1 of -- I get it. But the way it works in the White
2 House isn't the way it would work in a campaign or even
3 on Capitol Hill, for example, meaning that people go
4 through, when you recommend them for employment, more,
5 or you push them up for employment, they get vetted
6 both on a security clearance, and then there's an
7 internal White House. So you don't hire somebody the
8 way that you would in any other entity that I have been
9 affiliated with in the sense that -- except maybe the
10 military where you have to go through a series of
11 requirements before a formal offer is made to you.

12 Q. And did that apply to everybody in the Trump
13 White House?

14 A. I can't speak to that.

15 Q. Okay. Who is Jason Miller?

16 A. Jason Miller is a communications and
17 political operative.

18 Q. When did you first meet Jason Miller?

19 A. To the best of my recollection, the late
20 1990s. I believe we came across each other working on
21 Capitol Hill, but I can't say for certain.

22 Q. Have you ever had any personal business
23 relationships or co-owned or operated any businesses
24 with Mr. Miller?

25 A. No.

1 Q. Okay. Has he ever been an employee or
2 independent contractor of yours --

3 A. No.

4 Q. -- for your business? Okay. What is your
5 understanding -- so when you were at the RNC, I guess,
6 how would you have interacted? What would have been
7 your contact with Mr. Miller?

8 MR. BLUMETTI: Objection to form.

9 THE WITNESS: Mr. Miller was basically my
10 counterpart at the campaign.

11 BY MR. PHILLIPS:

12 Q. Okay. How often would you guys meet and
13 discuss issues as -- I guess, leading up to the 2016
14 election?

15 A. Potentially several times a day.

16 Q. Okay. And what was, to the extent you're
17 aware, Mr. Miller's role in hiring and firing of
18 communications employees in the campaign?

19 A. Mr. Miller was the top communications
20 official for campaign.

21 Q. Okay. When did you first become aware that
22 Mr. Miller and Ms. Delgado had a personal relationship?

23 A. There was a tweet that Ms. Delgado sent out
24 on or about December 21st, 22nd, that mentioned
25 something to the extent of my baby daddy has been named

1 White House Communications Director, at which time we
2 started getting a rather large influx of media
3 asking -- and in many cases supposing what that meant,
4 and which required me to discuss with Mr. Miller, who
5 had just been named White House Communications
6 Director, what exactly was going on.

7 Q. Tell me about that, those discussions.

8 A. Well, like I said, a tweet was sent out. It
9 said -- again, I don't have the particulars in front of
10 me. It said something to the extent of something my
11 baby daddy, can't believe he got named White House
12 Communications Director. Well, Jason was the only one
13 named White House Communications Director. I'm not hip
14 on every term, but I think I know what baby daddy
15 means. And I began asking him what the heck was going
16 on.

17 As I said, it was, you know, I don't know
18 what percentage. We had a number of folks in the media
19 seeking clarification, then some just outright
20 declaring that they knew what that meant, and they were
21 going to run with it. And so we had to get to the
22 bottom of it.

23 I think it was a series of -- when I say a
24 series, it was, hey, we need to talk about this, what's
25 going on? And then him -- it was a rather quick

1 evolution; meaning that I think within a short term he
2 said, hey, I'm going to step down or something of that,
3 but I don't have the exact timeline. But it was a
4 rather hectic 24/36 hours.

5 Q. Again, it's me trying to understand how the
6 umbrellas work, how they all work together. As of
7 December 21st or 22nd, you were still with the RNC;
8 correct?

9 A. I maintained employment with the RNC up until
10 Inauguration Day.

11 Q. When did you know you were going into the
12 White House?

13 A. At approximately 1:00 on December 22nd,
14 President Trump called and told me to put out a
15 statement naming myself White House Press Secretary,
16 Jason Miller Communications Director, Dan Scavino
17 Director of Social Media, I believe the title was, and
18 Hope Hicks Director of Strategic Communications.
19 That's when I knew.

20 Q. Okay. And did you do that?

21 A. I did.

22 Q. Okay. And as of that time, you were aware of
23 the tweet, correct?

24 A. No.

25 Q. Okay. So it's your --

1 A. Again, Counselor, I apologize. I don't have
2 documentation. I would have to look, but it was, you
3 know, at least 24 hours. So maybe it was the 20th.
4 The date of which the President announced our hiring is
5 public, but that was when I knew I was being hired.
6 And then, like I said, it was at least 24 hours before.
7 And then, again, I think the tweet is public so you can
8 figure -- do the timeline, but my best guess is it was
9 a minimum of 24 hours.

10 Q. Okay. And you said you got that call from
11 Mr. Trump, President Trump, at 1 p.m.?

12 A. Approximately.

13 Q. On the 21st or 22nd?

14 A. Again, it's -- I don't have it. I wasn't
15 prepared, but I believe it was either the 20th or the
16 21st. The release went out within an hour, so --

17 Q. Whatever that is.

18 A. Yeah. If you pause for one second I can -- I
19 will -- because I have a screenshot of it.

20 Q. Sure.

21 A. It's December 22nd.

22 Q. Which I would expect you to remember. That's
23 a big call to get. December 22nd.

24 Did this -- did this announcement come
25 completely by surprise, or did you have a vetting

1 process? Was there discussions that you being selected
2 was on the table?

3 A. We had had what I would say are several
4 informal conversations about the job. I knew he was
5 interviewing other people. I would -- it wasn't
6 completely by surprise, but it was never certain. And
7 there was a lot of scuttle about potential other
8 candidates.

9 Q. Okay. When -- did you ever ask Mr. Trump or
10 somebody in the campaign or transition to be considered
11 as press secretary?

12 A. Yes.

13 Q. And about when was that?

14 A. I mean, I can't tell you the first time. It
15 was sometime clearly after the election and before the
16 22nd. I don't recall specifically -- you know, I'm
17 sure I had several conversations with different folks
18 saying I would love to do this, but there was no --
19 there was no, like, formal request I had of anybody.
20 It was more of just in conversation.

21 Q. Okay. Did you defer to Jason Miller about
22 his selection of Comms employees for the White House?

23 A. Yes.

24 Q. Okay. What happened, I guess -- so we have
25 this announcement that goes out 12/22. And then you

1 believe there was a tweet or a series of tweets after
2 that.

3 A. Again, Counselor, I don't have the timeline
4 in front of me.

5 Q. Okay. And then some phone calls or text
6 messages with Mr. Miller?

7 A. I believe so, yeah.

8 Q. Okay. Do you still have those text messages?

9 A. With who, sir?

10 Q. With Mr. Miller.

11 A. Again, I don't know that -- I believe I said
12 they were calls. So if there were, I assume I would,
13 but I don't know. It was -- as you can imagine, this
14 kind of stuff is nothing you do over text.

15 Q. Right. Right. True. But I guess let me ask
16 a more general question for discovery purposes: Do you
17 maintain the same phone that you would have had in
18 2017?

19 A. Yes.

20 Q. And do you essentially delete your archives?
21 Do you delete texts as they come in, or do you just
22 kind of let them scroll in?

23 A. I mean, I would say 99 percent of the time I
24 let them flow in.

25 Q. I'm going to ask you just to save any

1 messages you have from that period of time,
2 particularly with Mr. Miller, and we'll address it.
3 After the depo you can certainly go look back and see
4 if there were texts, but just please don't delete
5 anything.

6 Okay. It's my understanding that Ms. Delgado
7 was planning on being a White House employee. Is that
8 incorrect?

9 A. I can't speak to what she believes.

10 Q. Okay. What is your understanding as of
11 January 22nd, 2022 as to whether Ms. Delgado would be a
12 White House employee?

13 MR. BLUMETTI: Objection to form.

14 THE WITNESS: So as I mentioned, until
15 Inauguration Day there is no White House employee.
16 No one could offer employment that wasn't a White
17 House employee. So you could want to, you could
18 intend to, but there is no way you could be or be
19 offered something until such time as there was
20 somebody who was an employee of the White House to
21 make that offer.

22 BY MR. PHILLIPS:

23 Q. Okay. Do you know whether Mr. Trump or
24 Mr. Miller had made her offers to be in the White
25 House?

1 A. I have never asked either.

2 Q. Okay. Fair enough. At what point and for
3 what reason did you decide not to employ Ms. Delgado?

4 MR. BLUMETTI: Objection to form.

5 THE WITNESS: Just to be clear, again, the
6 incident -- well, I would just say first and
7 foremost, I wouldn't have considered anybody who
8 exhibited the behavior that Ms. Delgado did
9 publicly with the tweets. It's hardly acceptable
10 behavior for anybody who wants to work in the
11 White House, never mind a communications job.

12 Number two, you know, I question whether she
13 would have passed the vetting based on some issues
14 that she had had in the past.

15 Number three, I was never impressed with her
16 performance on the campaign.

17 Number four, I don't think she ever had the
18 experience that is required for the specific and
19 limited number of jobs that exist in the White
20 House.

21 And I think number five, as I said, I wasn't
22 in a position until January 21st to do that.

23 BY MR. PHILLIPS:

24 Q. Okay. As of January 21st when you were able
25 to do that, did you have communications with Ms.

1 Delgado about employment at the White House at or after
2 the 21st?

3 A. I don't believe so. I would have to check
4 what the timeline was, but I believe by the time that I
5 had assumed the duties of White House Press Secretary,
6 that -- I don't know. There may have been some texts
7 sent to me. I don't know that I responded to anything.

8 Q. Okay. Did you help her get a job at a PAC or
9 think tank or some other organization, politically
10 oriented organization?

11 A. I did not help her with a PAC. I think there
12 may have been some discussion about maintaining
13 something on the campaign.

14 Q. Okay. Tell me about that.

15 A. Ms. Delgado asked at some point about
16 potential options in the interim, and I had suggested
17 that she touch base with -- the campaign needed to
18 maintain itself in some entity and suggested that that
19 might be an option that she discuss with them.

20 Q. Okay. And do you know how that proceeded?

21 A. I don't.

22 Q. Okay. What is America First policies?

23 A. I don't know.

24 Q. Who is Brian Walsh?

25 A. Brian Walsh is a political operative that has

1 run campaigns, campaign committees, and Super PACS.

2 Q. Are you aware if you had any role in
3 connecting Mr. Walsh and Ms. Delgado?

4 A. By the way, I'm trying to remember, just to
5 your first question, America First Super PAC, I
6 believe, had a policy arm. I don't know that that's
7 the proper name, but I can't -- I would have to -- I
8 would have to check with -- so I just want to revise my
9 comment on the first one. I don't know that that's the
10 actual name, but there was a policy component to the
11 Super PAC. It has to do with federal law and the IRS.
12 But I just want to be clear I'm not trying to be
13 evasive. I just don't know that that's the name.

14 Q. Okay. And I can just go by what's on the
15 letterhead. I'm trying not to overzealously throw
16 exhibits at you that you don't really need, but I have,
17 essentially, an offer of employment from November 28,
18 2017 from Brian Walsh to Ms. Delgado at what is listed
19 as America First Policies. And I'm trying to
20 understand if you had any involvement or
21 recommendations related to that.

22 A. No.

23 Q. Okay. I think I asked this in a different
24 way, but I want to clarify that for purposes of White
25 House Comms, who would have been the one that would

1 have decided whether Ms. Delgado was a candidate for
2 employment?

3 A. At what period?

4 Q. Going into the White House as of January
5 21st.

6 A. That would be me.

7 Q. Okay. Did you retain Omarosa Manigault
8 Newman?

9 A. No.

10 Q. Who did?

11 A. I'm not entirely -- the Deputy Chief of
12 Staff, Katie Walsh, I believe was involved in that. I
13 don't -- I didn't have anything to do with her hiring.

14 Q. Do you know what her status was with regard
15 to passing background investigations?

16 A. I do not.

17 Q. Okay. Are you aware of whether -- you're
18 aware of her recordings, I assume?

19 A. Yes.

20 Q. The fact that she recorded?

21 A. Correct.

22 Q. Are you aware of whether or not you were
23 recorded by her?

24 A. I'm not.

25 Q. Okay. What communications did you have with

1 Jason Miller about Ms. Delgado?

2 A. None.

3 Q. None whatsoever?

4 A. I don't believe so. Once Mr. Miller stepped
5 down on the advice of counsel, we did not discuss the
6 matter.

7 Q. Okay. I guess leading up to that, before he
8 stepped down, what's your understanding from Jason
9 Miller's perspective of his relationship with Ms.
10 Delgado?

11 A. I wasn't aware of anything beyond a -- to be
12 blunt, I'm not entirely sure what her status was during
13 the campaign. In terms of what he had -- again, all of
14 the hiring and all of the management was from the
15 campaign side. So what interaction they had, what
16 discussions about roles and responsibility were all
17 between the two of them or -- I don't know. I actually
18 had nothing to do with hiring, so I don't know. Maybe
19 that had to do with HR or something. I just would have
20 no visibility on that.

21 Q. When you spoke to Mr. Miller on the 22nd or
22 23rd, around that time, after you read the Delgado
23 tweet, did you address with him the substance of those
24 tweets? Did you say, hey, is this true?

25 A. I can't recall. I'm sure I did, but I can't

1 recall.

2 Q. Okay. Do you have any recollection of
3 anything Mr. Miller relayed to you about his personal
4 relationship with Ms. Delgado?

5 A. At this point, this was a media firestorm. I
6 mean, that's what we were dealing with and how to quell
7 that. It was right before Christmas. This was right
8 after, as I mentioned, a series of announcements in
9 terms of staff. So the nature of our conversations
10 almost entirely -- or surrounded the media response to
11 this. How are we responding, who else is asking, how
12 we can put out fires. This was a five alarm fire for a
13 campaign that had just won.

14 Q. Why was it a five alarm fire?

15 A. Well, the first thing any campaign is getting
16 asked is who are you surrounding yourself -- what's
17 going on? Jason had just been named White House
18 Communications Director and here he is embroiled in a
19 personal scandal. And that's all the media wanted to
20 talk about. This was sort of coming right out of the
21 gate after a win. You know, this was not -- this did
22 not reflect well on the campaign or the candidate.

23 Q. What was the personal scandal? What was the
24 scandal?

25 A. Well, again, I'll leave that up to employment

1 counsel, but when you have employer -- two people of --
2 in a similar department, one person is the boss, the
3 other one is Mr. Miller who was currently married and
4 expecting a child with his wife, I don't think that's a
5 particularly great story for -- on the Republican side.

6 Q. It's adultery?

7 A. It is.

8 Q. And it's sexual harassment?

9 MR. BLUMETTI: Objection.

10 THE WITNESS: I'll let you -- that's your
11 words, not mine.

12 BY MR. PHILLIPS:

13 Q. Okay. At your company, do you have female
14 employees?

15 A. I do.

16 Q. Do you have a policy related to male/female
17 interactions in the workplace?

18 A. We do not have anything written, no.

19 Q. Do you have a sexual harassment policy?

20 A. We do not.

21 Q. Okay. In any of the situations where you
22 have been the executive in charge of others, have you
23 had a policy where supervisors are not supposed to have
24 sexual relationships with their inferiors?

25 MR. BLUMETTI: Objection to form.

1 THE WITNESS: In my company, I'm the --
2 everyone is a direct report to me, so that would
3 be me.

4 BY MR. PHILLIPS:

5 Q. Okay. Would you engage in a relationship
6 with somebody inferior to you?

7 MR. BLUMETTI: Objection to form.

8 THE WITNESS: Well, I'm married. I wouldn't
9 engage in an appropriate relationship with
10 anybody.

11 BY MR. PHILLIPS:

12 Q. Okay. Fair enough. Are you aware if Jason
13 Miller was ever employed by the Executive Office of the
14 President or the Trump White House?

15 A. No, he was not.

16 Q. Where was he, I guess, reemployed?

17 MR. BLUMETTI: Objection to form.

18 THE WITNESS: Mr. Miller was -- I don't know
19 his exact title -- either Communications Director
20 or Senior Communications Official with the
21 transition team. And my understanding is up until
22 January 21st, maybe beyond that -- I can't
23 remember the date -- that he maintained that
24 position.

25 BY MR. PHILLIPS:

1 Q. I'm trying to get familiar with some of the
2 names of people here in this case, so you're going to
3 be kind of, unfortunately, my identifier. Who is Rob
4 Porter? Some of these you might not know.

5 A. Rob Porter served as the Staff Secretary in
6 the White House and had previously been a Capitol Hill
7 staffer as well.

8 Q. Okay. Are you aware of, I guess,
9 Mr. Porter's -- did you do a background check on
10 Mr. Porter?

11 A. I didn't do a background check on anybody.
12 That's not my job.

13 Q. So help me understand. I think I get it. I
14 think -- you're taking over as Press Secretary. You
15 have issued a press release where Jason Miller is to be
16 Director of Comms. Was AJ Delgado mentioned in that
17 press release you drafted?

18 A. No. There were only four senior aides;
19 myself, Jason Miller, as I mentioned, Hope Hicks, the
20 Director of Strategic Communications, and Dan Scavino,
21 the Director of Social Media.

22 Q. Okay. And who does -- my understanding is,
23 and correct me if you have a different understanding,
24 but that Mr. Miller was recommending Ms. Delgado for
25 White House employment. How would she be run through a

1 background check to the extent you're even aware? Like
2 what's the process for the White House to then
3 determine whether that person qualifies?

4 A. My understanding is there is two steps.
5 There's a general application that the White House
6 counsel would look at internally, so if there are
7 issues that are more of a political nature, meaning
8 somebody's character, somebody's bearing, their
9 affiliations; in other words, there's a political
10 vetting that goes more to character and suitability for
11 the job.

12 And then there's what they call an SF86,
13 which is a standard form in which you fill out, that
14 is, in this case for the White House, adjudicated by
15 the FBI where you are looking at somebody's criminal
16 behavior, their known associates, potential past
17 lifestyle choices in terms of drugs, potential for
18 blackmail. So personal relationships, alcohol and drug
19 use.

20 And so what would happen is the most senior
21 aides would have those rushed through so that they can
22 begin employment on January 21st. And then employment
23 of others would kind of come through on a sliding scale
24 if you wish.

25 Q. Okay. I guess what I'm trying to understand

1 is where the process stopped for Ms. Delgado. Once
2 Jason Miller resigned, did you -- we talked about
3 earlier that you would have deferred to his
4 recommendations.

5 A. Uh-huh.

6 Q. It seems to me you didn't defer to the
7 recommendation of Ms. Delgado or somehow that changed
8 by the tweet?

9 A. Correct.

10 Q. Help me understand that.

11 A. We both maintained lists of potential
12 employees that could fill -- remember there is a
13 limited number of jobs at the White House. I think the
14 White House Press Office was 12. And so they're very
15 specific. There's X number of assistant press
16 secretaries. There's a couple very junior people.
17 There's three deputies. And then a couple assistants,
18 and that's it.

19 So we would put together, you know, lists of
20 people that we thought would be qualified as well as
21 options, this person and this person. And I know Jason
22 had done the same. And then when he stepped down, I
23 was told that I would accept the responsibility of all
24 of -- the roles and responsibilities that came with
25 that position as well. So as those positions came up,

1 I reviewed the names that he had suggested as well as
2 names that I also thought would be good and fulfilled
3 them.

4 Q. And thus Ms. Delgado, I guess, hit the
5 cutting room floor?

6 MR. BLUMETTI: Objection to form.

7 THE WITNESS: Yeah. I think I have answered
8 this question before. I think there were several
9 reasons why I wouldn't have considered her.

10 BY MR. PHILLIPS:

11 Q. Do you recall having conversations with Ms.
12 Delgado around that time?

13 A. The conversations that I had with Ms. Delgado
14 I believe were somewhere in the timeframe of Christmas
15 week. And I don't know that we -- so there was a
16 timeframe, yes.

17 Q. Okay. Do you recall a conversation about her
18 pregnancy and, I guess, pending having an infant?

19 A. I mean, I guess I remember having
20 conversations with her regarding what she had been
21 promised or thought she was promised by Mr. Miller.

22 Q. Okay. Tell me about what you recall about
23 that.

24 A. He had told her at one point that she would
25 be able to work from Miami, that she was going to need

1 the support of her family and friends to raise this
2 child, and that Mr. Miller told her there would be no
3 problem to work from Miami to do the job.

4 Q. Okay. And what conversations did you have
5 with Ms. Delgado about that?

6 A. Well, I explained to her that White House
7 jobs worked in the White House and that would be
8 like -- and, also, I don't know that there was much of
9 a sense of specificity with the role that Mr. Miller
10 had discussed with her. I was very clear about what
11 the requirements for working in the White House and the
12 role and responsibility of the most basic jobs
13 entailed.

14 Q. Did you tell her that you didn't think she
15 could do the job or that this wasn't a suitable job for
16 her because she would have a baby?

17 A. No.

18 Q. Did you discuss the need of needing a nanny
19 or the struggle of a single mother trying to keep up
20 with this job?

21 A. I explained to Ms. Delgado the complex and
22 demanding nature of the job, and when she asked me how
23 I was able to do it, I explained to her the support
24 mechanism that I maintain to do something of that
25 nature.

1 Q. Are single mothers disqualified in your
2 hiring protocol from working, I guess, in positions at
3 the White House that are highly demanding?

4 A. Absolutely not.

5 Q. Why not? Help me understand.

6 A. Why are they not excluded?

7 Q. Yes.

8 A. I have always hired the best and most
9 qualified individual for every job that I had the
10 responsibility of overseeing. And I don't -- if
11 somebody can do a job, and there's constraints on it,
12 we can make accommodations.

13 Q. Okay. Did you offer Ms. Delgado any
14 accommodations?

15 A. I think, Counselor, as I explained, Ms.
16 Delgado wasn't qualified by her behavior. And I don't
17 believe she had the necessary requisite communication
18 skills to handle the job that was necessary. So it
19 wasn't a question of ever -- her family situation as
20 much as it is qualification for the job; temperament,
21 judgment, and they all lacked.

22 Q. Did Omarosa Manigault Newman have temperament
23 for the job?

24 A. I don't believe so, but I didn't hire her.

25 Q. Okay. Then kind of help me understand.

1 Wouldn't that -- wouldn't that position -- was
2 Omarosa's position within Comms at the White House?

3 A. So she was technically under the Office of
4 Public Liaison, but because it was a communications
5 job, they wanted to create what they call a dotted line
6 to communications so that she wasn't supposed to be
7 able to act as a free agent, if you will. But I had no
8 oversight over her. I didn't hire her. So the
9 qualifications that she maintained or didn't were not
10 something that I had any input in terms of the
11 employment process or the recommendation process for
12 that matter.

13 Q. Do you know who was hired kind of instead of
14 Ms. Delgado?

15 MR. BLUMETTI: Objection to form.

16 THE WITNESS: There was no instead of.

17 BY MR. PHILLIPS:

18 Q. Do you know who was -- so was there somebody
19 that assumed a role related to Hispanic outreach in the
20 White House?

21 A. Yes.

22 Q. Who was that?

23 A. There were two individuals. One was Helen
24 Ferre. The other one was a woman by the name of Sofia
25 Boza.

1 Q. Okay. Sofia. And how did they come to your
2 attention? How did -- I guess, did you -- strike that
3 question. Did you retain them?

4 MR. BLUMETTI: Object to form.

5 THE WITNESS: I don't know where they were on
6 an org chart prior to that. Both were in the
7 pipeline for employment. It was a question of
8 where. I had worked with both of them and highly
9 recommended them.

10 BY MR. PHILLIPS:

11 Q. Do you have any specific criticism of work
12 that Ms. Delgado did in the media related to the Trump
13 campaign?

14 A. I wasn't her -- I wasn't really aware of much
15 work that she did.

16 Q. Okay. You didn't review it to determine
17 whether or not she was qualified?

18 A. I had interactions with her enough that her
19 judgment was something that I questioned alone. I
20 didn't believe that she had the requisite -- doing
21 media hits, which is what largely her job had been, is
22 not a qualification for any of the jobs that are
23 currently at the White House.

24 Q. Okay. My paralegal just handed me an article
25 that said Helen Aguirre, A-G-U-I-R-R-E, Ferre,

1 F-E-R-R-E, deletes anti-Trump tweets after taking RNC
2 job of selling Trump to Hispanics. Do you recall her
3 sending tweets that were derogatory to Trump?

4 A. I do not.

5 Q. Was it your decision to not retain or keep
6 Jason Miller -- strike that.

7 Were you involved with the decision to --
8 sorry. Were you involved with the decision for Jason
9 Miller to resign?

10 A. No.

11 Q. You go through enough jobs either as an
12 employee or employer and understand sometimes
13 resignations aren't actually resignations. An employee
14 is given the option to resign in lieu of termination.
15 Do you know what -- related to Jason Miller, whether
16 his resignation was a resignation or something else?

17 A. To the best of my knowledge, Mr. Miller
18 proactively resigned. But there was no indication that
19 I have that he faced any immediate pressure to do so.
20 It was -- I mean, there was no gap. It was when he
21 realized the incoming media scrutiny, he said, "I have
22 already made a decision." It wasn't -- there wasn't
23 enough time to even have a discussion as far as I
24 recall. It was, I'm doing this. So I don't --

25 Q. Okay. Do you know if Jason's resignation had

1 anything to do with the e-mail Ms. Delgado sent to you
2 January 4, requesting that he resign?

3 A. I don't know, no. I do not. Just to be
4 clear, are you asking if I know that, or do I believe
5 that that factored in?

6 Q. Either.

7 A. As I said previously, I believe Mr. Miller
8 proactively offered up his resignation.

9 Q. Who was Eric Drieband, D-R-I-E-B-A-N-D?

10 A. Mr. Drieband is an attorney. During that
11 period of time, he was an employment attorney. I
12 assume he still is, but I don't know.

13 Q. Do you know who contacted him about Ms.
14 Delgado's situation or claims?

15 MR. BLUMETTI: Objection to form.

16 THE WITNESS: I would have imagined that it
17 would have been Don McGahn, who was the general
18 counsel of the campaign, who I believe had a --
19 who knew who he was.

20 BY MR. PHILLIPS:

21 Q. Okay. Do you have your text messages in
22 front of you that you sent and received with Ms.
23 Delgado?

24 A. I don't, but I can -- no, I don't have them.
25 I have my phone. I don't have them printed out.

1 Q. And when we take a break, I can put them up
2 on the screen if need be. But I have a December 30,
3 2016 text message, Plaintiff Bates Stamp 281, that
4 says: "I'm going to have Eric Drieband call you. He
5 is an employment attorney that we brought on because of
6 how serious we are taking this."

7 What did you mean -- what were you taking
8 seriously?

9 A. Ms. Delgado had communicated that there was
10 this relationship that she described between her and
11 Mr. Miller, him being her boss. And again, since none
12 of that happened within my purview, it had been
13 recommended that we get an employment lawyer to
14 interact with her, to make sure that we addressed or
15 acknowledged her concerns and figure out how -- what
16 were the options moving forward depending on -- again,
17 a lot of it was this is not my wheelhouse. I'm not a
18 lawyer. I don't have any background in HR. And she
19 made some serious concerns known in these e-mails. And
20 the idea was, how do we best handle them.

21 And it was told to me by Don McGahn and
22 Reince Priebus that we needed to retain counsel to
23 address the concerns that she had. They told me who
24 that was, Mr. Drieband. And I was told to communicate
25 that to her so that it was handled in a professional,

1 legal way.

2 Q. Were you involved in that investigation at
3 all?

4 A. No.

5 Q. Do you know what the results of --

6 A. Investigation into what? I'm sorry.

7 Q. I guess into the relationship between -- or
8 the accusations between or by Ms. Delgado about her
9 relationship with Mr. Miller.

10 A. No.

11 Q. Okay. What's your understanding of -- I
12 guess I'll put it in common speak. What happened with
13 Mr. Drieband? How did that resolve? What happened?

14 MR. BLUMETTI: Objection to form.

15 THE WITNESS: I don't -- I mean, again, as I
16 stated, it was told to me for a variety of, like,
17 HR/legal reasons we needed to retain counsel.
18 Mr. Drieband would become the interlocutor to Ms.
19 Delgado and they would move forward, but that
20 clearly someone like me was not professionally
21 equipped to deal with the concerns that she
22 raised.

23 BY MR. PHILLIPS:

24 Q. And do you recall when in correlation to that
25 Ms. Delgado was essentially recommended that she could

1 return to the campaign?

2 A. I do not.

3 Q. Okay. Would that have been Sean Dollman's
4 decision as to whether to retain her?

5 A. Who -- I don't know who Sean Dollman is.

6 Q. Okay. Did you ever tell Ms. Delgado that the
7 team was going to take care of her?

8 A. I can't recall.

9 Q. Do you know what role, if any, Eric Trump had
10 in the -- related to the employment of AJ Delgado?

11 A. I do not.

12 Q. We have gone about an hour and a half. If we
13 can take like a ten minute break, then we can reset,
14 clean up, and try to get this thing moving along and
15 done. Is that okay?

16 A. When you say moving along and done, like what
17 are you talking?

18 Q. I hope to finish by lunchtime. I'm going to
19 take a break to kind of speed through some of my notes.

20 THE WITNESS: Jared, are we okay with that?

21 MR. BLUMETTI: Yes. That's fine with us.

22 MR. PHILLIPS: Go off the record.

23 THE VIDEOGRAPHER: The time is now 10:24 a.m.

24 We are going off the record. This is the end of

25 Media Unit 1.

1 (A recess was taken.)

2 THE VIDEOGRAPHER: The time is now 10:36 a.m.
3 We're back on the record. This is the beginning
4 of Media Unit 2. Please continue.

5 MR. PHILLIPS: Thank you for that.

6 BY MR. PHILLIPS:

7 Q. Mr. Spicer, how many times -- and I know
8 there is going to be a little bit of a guess component
9 to this, but how many times have you physically been in
10 the same room as Ms. Delgado?

11 A. 15.

12 Q. Okay. Okay. When you were in her physical
13 presence, did anything stand out as inappropriate that
14 she did that you recall?

15 A. There were comments here and there that she
16 would make that I didn't think always were
17 professionally appropriate. I just -- if you were
18 going to ask me to name one, I don't know that I can.
19 I just remember coming away as an impression of
20 somebody who was a little professionally inappropriate
21 might be the word.

22 Q. We're also talking about Donald Trump here,
23 aren't we?

24 MR. BLUMETTI: Object to form.
25

1 BY MR. PHILLIPS:

2 Q. Was he professionally appropriate in all of
3 his communications?

4 A. Oh, absolutely not. No, I think Mr. Trump
5 has a very unique style.

6 Q. So is there any recollection whatsoever you
7 have of anything inappropriate she's ever done or said
8 specifically?

9 A. I mean, I think the tweets that were sent out
10 around the December thing were highly unprofessional.

11 Q. Have you ever tried to look at this from the
12 perspective of her blowing the whistle or being a
13 victim of sexual harassment and letting people know?

14 MR. BLUMETTI: Objection to form.

15 THE WITNESS: I'm not -- I think that was why
16 we engaged employment counsel.

17 BY MR. PHILLIPS:

18 Q. Okay. Did you have -- do you know when you
19 and Ms. Delgado exchanged numbers?

20 A. I do not.

21 Q. Okay. Do you know whether you had her cell
22 number when the tweets hit?

23 A. I don't.

24 Q. Okay. Did you try to call her and get her
25 side of the story or ask her about the tweets?

1 A. No.

2 Q. Why not?

3 A. Because she didn't work for me.

4 Q. Did Mr. Miller ever express an opinion about
5 whether he was withdrawing her recommendation or don't
6 hire Ms. Delgado, anything like that?

7 A. He never commented.

8 Q. Okay. We talked a little bit earlier about
9 whether or not Ms. Delgado could work for the White
10 House from Miami. Do you recall that? Was it your
11 understanding that Mr. Miller had said that she could?

12 A. It was.

13 Q. Okay. Do you know if he had an ongoing
14 sexual relationship with her when he was making those
15 promises?

16 A. I don't.

17 Q. Do you know whether he had an ongoing sexual
18 relationship with her when he told her she could get a
19 spot in the White House?

20 MR. BLUMETTI: Objection to form.

21 THE WITNESS: I don't.

22 BY MR. PHILLIPS:

23 Q. Who is Stephanie Grisham?

24 A. Stephanie Grisham was a communications
25 staffer that was employed by the Trump campaign,

1 subsequently went on to be Deputy Press Secretary and
2 Chief of Staff to the First Lady.

3 Q. What was your role in offering her employment
4 or hiring her?

5 A. I had been impressed with Ms. Grisham during
6 the campaign and her interactions with the media. She
7 was what's known sort of colloquially as a wrangler.
8 She travelled with the press that was assigned to then
9 candidate Trump. The press thought very highly of her,
10 her skill set, her demeanor.

11 And she had asked me to -- there's a separate
12 advance department or whatever in the White House.
13 Those are the folks that travel ahead of the President.
14 Within that division there are, they call them, press
15 leads because they're moving with the media into those
16 events. Ms. Grisham had been in talks with the person
17 that was going to lead that, that they wanted her to
18 come work for her. And I had discussions with her
19 saying that, you know, I would be equally interested in
20 bringing her into a position in the press office
21 itself.

22 Q. When you vet somebody for a position like
23 that, what do you take into consideration?

24 A. Their experience working with -- again, I
25 would say that it depends -- every position is unique,

1 right? But 90 percent of the jobs have to go to
2 experience of putting -- you know, in Ms. Grisham's
3 position, it was the relationship --

4 MR. BLUMETTI: Is that on his side?

5 MR. PHILLIPS: It has to be.

6 THE VIDEOGRAPHER: We can go off the record.

7 MR. PHILLIPS: Sure.

8 THE VIDEOGRAPHER: The time is now 10:43 a.m.
9 We are going off the record.

10 (A discussion was held off the record.)

11 THE VIDEOGRAPHER: The time is now 10:44 a.m.

12 We are back on the record. Please continue.

13 BY MR. PHILLIPS:

14 Q. In the brand new world of Zoom, we
15 sometimes -- we've got tech issues. So you were mid
16 answer of a question I don't even remember at this
17 point.

18 A. I do.

19 Q. You do? Okay. My question --

20 A. Your question was: What do you consider for
21 a certain position, what qualifications? I would just
22 say first of all, remember that every one of the
23 positions, for the most part, is unique in the sense
24 that this isn't a large bureaucracy. As I think I
25 previously mentioned, in the White House press office I

1 think there's 12 jobs, right? They all have specific
2 responsibilities. Communications office is really not
3 that much different.

4 But in the case of Grisham, who you were
5 asking about, she had developed very strong
6 relationships with many of the reporters that would be
7 covering us. They appreciated how she was able to work
8 with them logistically. Every trip that the President
9 or then candidate takes requires tremendous planning,
10 and there's a give and take.

11 The campaign, or in this case, in the future,
12 the White House, there are only so many press folks
13 that can get in. The cameras want to be closer, but
14 they can't be this close. They need to plug in. She
15 understood the needs and how to sort of, for lack of a
16 better word, play referee in a very effective way. Get
17 a little bit more of what they needed while
18 understanding that the campaign and eventually the
19 White House didn't -- isn't going to give you full
20 access to the President of the United States. You are
21 not going to get 40 people in, but here's how maybe we
22 can have an overflow or whatever.

23 She was very creative. Had a very calm
24 demeanor in terms of handling stressful situations.
25 And as I said, was liked by all parties. The Trump

1 family liked her. The press staff enjoyed working with
2 her. The media reporters, I felt like her previous
3 experience both in Arizona politics, what she had done
4 in a previous presidential campaign, were all assets
5 that would be helpful to us.

6 Q. Okay. Did you review AJ Delgado's
7 relationships with Hispanic media prior to making the
8 decision not to retain her?

9 A. No.

10 Q. Did you review her relationship with and
11 encounters with Mr. Trump?

12 A. No.

13 Q. Did you ask --

14 A. As I said earlier, no, I didn't ask Mr. Trump
15 about any hires outside of the Deputy Press Secretary.
16 Those don't rise to the level of the President or the
17 candidate. I would just tell you if anybody sent -- I
18 don't know that -- the actions that she took publicly
19 around December 22nd, 23rd, whatever it was, to me are
20 disqualifying on itself, regardless of anything else.

21 The idea that you put out something publicly
22 that was intended to be damaging, that created damage
23 and reflected poorly on the President of the United
24 States, the transition, the campaign, I mean
25 everything. I literally spent my Christmas dinner

1 dealing with reporters sitting outside in the cold on
2 the porch to get this story tamped down, and in most
3 cases shut out, because we didn't want to deal with it.

4 I mean, I did nothing for 72 hours but use my
5 personal relationships and chips that I had built up
6 over decades to get -- to try to make reporters
7 understand, especially during Christmastime, that you
8 had two individuals that engaged in a relationship and
9 this was not worthy of public consumption to the extent
10 that I could, and in several cases very successfully.
11 But for at least 72 hours, if not 96 and more, this was
12 the only thing that we dealt with. And I cannot tell
13 you how much political capital I spent to change the
14 tone, stop stories from occurring.

15 And in my opinion, an action like that -- and
16 like that, meaning it wasn't just a tweet. There was
17 several calls to other reporters. Her discussion with
18 other reporters to explain to them what was going on
19 was something that I was also dealing with, meaning
20 that that was it. That view, in my opinion, is
21 something that we would never ever consider taking
22 somebody into the White House.

23 Q. And it sounds like there's some resentment of
24 her?

25 MR. BLUMETTI: Objection to form.

1 THE WITNESS: Resentment? I'm sorry. Why --

2 BY MR. PHILLIPS:

3 Q. I mean, I guess you have made it abundantly
4 clear that, you know, AJ's tweet ruined Christmas
5 dinner.

6 A. No. I explained to you the actions that I
7 took, Counselor. I want you -- and what I'm hoping to
8 do is make sure you understand that, in a world where
9 we have to deal with a media that is going to report
10 things. I mean, frankly, part of the reason I resigned
11 as White House Press Secretary, as I said in a book
12 that I wrote, is that, you know, I became the story too
13 often.

14 The job of a spokesman and a communication
15 staffer is to further the message of the principal. If
16 you are becoming the story, then you need to get out of
17 the way, which is why, frankly, I ultimately resigned.
18 I felt as though I had become the story too often. So
19 I don't resent anything. I just want you to understand
20 what the job is about and why you need people that you
21 have confidence in their judgment, their experiences,
22 their demeanor. And those are things that I don't
23 think that Ms. Delgado possessed.

24 Q. Okay.

25 A. And again, just to go back, I think this is

1 important to just note. You know, this isn't -- these
2 are very specific jobs where you have to hire people
3 that you feel confident that have the experience in
4 doing them. Her job on the campaign largely would be a
5 general surrogate. There's a lot more that goes along
6 with these jobs. As I mentioned, you were asking about
7 qualifications in terms of planning, event rollouts,
8 things like that. That was not the role of a
9 surrogate. There was nothing that led me to believe,
10 based on what I witnessed, you know, from my position
11 at the RNC that this was somebody who was qualified to
12 do that.

13 Q. Okay. She had, and how she got it is a
14 separate question, but she had Jason Miller's
15 unqualified endorsement?

16 A. I don't know that that's true.

17 Q. Okay. Did she have -- are you aware if she
18 had Donald Trump's endorsement?

19 A. He never expressed it to me.

20 Q. Did you ask?

21 A. I didn't ask him about any employees.

22 Q. And you didn't review her interviews or look
23 at her body of work while she was, you know, a
24 surrogate or part of the campaign?

25 A. No. That's not what I said. You didn't ask

1 me about that. I have seen some of the interviews that
2 she had done, yes.

3 Q. Okay.

4 A. When you -- again, with all due respect, and
5 I mentioned this a moment ago, doing interviews is not
6 the job of what a White House staffer does with the
7 exception of the White House Press Secretary and other
8 senior policy makers. The press staff is not on
9 camera. That's not their job. I think that there is
10 this misunderstanding largely that that's the role of
11 press people. And, frankly, it's not even the role of
12 the press secretary for the most part. During a
13 campaign, you do a lot more surrogate work. In the
14 White House, that is not a role. That's not a job.

15 Q. Did you review her e-mail history with Bannon
16 or Miller or others in Comms to see where she helped
17 tamp down issues and clarify positions related to Cuba?
18 Did you review her body of work?

19 A. I didn't review -- no. I wasn't made privy
20 to that.

21 Q. Okay.

22 A. I guess just so we're clear, though, when it
23 came time to put together -- again, you're asking me --
24 we discussed the timeline of my interaction with her.
25 The only real interaction I had with her was this

1 incident that occurred. So the only time I would have
2 had to review it would have been after that, when it
3 became my responsibility. And after the actions that
4 she took, both privately in backgrounding with folks in
5 the media, and then publicly with tweeting excessively,
6 why would I -- I, frankly, beg to differ. I don't know
7 that anybody -- if someone had found out that I was
8 spending a ton of time interviewing someone that had
9 committed the actions that she did, I would have fired
10 that person too.

11 Q. What do you mean "committed the actions"?

12 A. In other words, she was actively talking to
13 the press and backgrounding them about the incident
14 that occurred, presenting her side, talking about
15 what's going on, she had sent out tweets. My point is
16 is that I don't know anyone in their right mind that
17 would at that point deem somebody qualified.

18 Q. What evidence do you have that she did
19 anything other than send the tweets?

20 A. Reporters calling me and saying that they had
21 spoken to her.

22 Q. Her or an unnamed source?

23 A. I'm sorry?

24 Q. Her or an unnamed source?

25 A. Her.

1 Q. Who said they spoke to her?

2 A. One of them was a reporter by the name of
3 Mark Caputo.

4 Q. Okay. Do you know whether Jason Miller
5 received any discipline from his employer related to
6 this?

7 A. I do not.

8 Q. Okay. Are you aware at all of
9 Mr. Miller's -- well, let me ask this in a way that's
10 not going to get myself in trouble. Are you aware of
11 whether Mr. Miller had had these issues in the past
12 related to allegations of workplace harassment or
13 sexual misconduct?

14 A. I am not.

15 Q. Okay. Are you aware of whether Mr. Miller,
16 before Ms. Delgado, had impregnated anyone other than
17 his wife?

18 A. No.

19 Q. Okay. Was it -- as of January 21st, could
20 you hire or fire Mr. Miller?

21 A. No.

22 Q. Okay. Bear with me. Do you know whether Ms.
23 Grisham had -- what her educational background was?

24 A. I mean, I knew that -- I think in passing we
25 probably discussed where we went to school, went to

1 college, but I can't say that I know much about her
2 specific education background.

3 Q. Did she have a college degree?

4 A. I don't know. I still don't know.

5 Q. Do you know if she had a criminal history?

6 A. I don't know. I believe Ms. Grisham has
7 written a book in which she said that we had a
8 discussion during the transition where she made me
9 aware of a DWI. Her recollection of the account is
10 that I told her that it was -- it would be adjudicated.
11 Whether -- I don't recall that conversation, but I just
12 want to make you aware that there is a public record of
13 her side saying that I don't recall ever having that.
14 I have expressed that to her, that I don't recall
15 saying it. But she said that I did, so I want you to
16 be aware of it, which, you know, she had said something
17 to the effect of a DWI, to which I told her, you know,
18 this will be up to the SF86 and others to determine if
19 that's a disqualifying incident. You know, I don't get
20 to make those decisions. But that's it.

21 Q. Okay. I was waiting for you to be done with
22 your answer because you still had your lips pursed.

23 Who is Max Miller?

24 A. Max Miller is a member of Congress from Ohio.

25 Q. Okay. Congress. Did he serve in the White

1 House after serving on the campaign?

2 A. I don't believe during my tenure.

3 Q. You don't know whether or not Ms. Delgado
4 would have made a -- gotten her security clearance as
5 we sit here today; correct?

6 A. That's not my job, no; but I will say I have
7 a sense of the issues -- well, I cannot -- I hope you
8 respect the fact that I cannot discuss why people were
9 denied clearances. Frankly, it wasn't always made
10 crystal clear to me.

11 For obvious media reasons, there were times
12 in which we had to dismiss a staffer or ask them to go,
13 in which the counsel's office would generally explain
14 the rationale behind that. Also, I have had a
15 clearance for 25 years. I'm aware of general offenses
16 that would preclude somebody, but I do not obviously
17 conduct those.

18 Q. Okay. It seems that this is all boiling back
19 to the tweet being disqualifying, so I don't know that
20 you would have ever even gotten to that analysis; am I
21 correct?

22 A. Yes. But I want to make one thing clear. A
23 tweet isn't disqualifying. Judgment is disqualifying.
24 I think the judgment as far as sending the tweet, how
25 the tweet was handled, how it was reacted to, the

1 subsequent tweets. So I think there is a -- it would
2 be very simplistic to lay it as a tweet was sent. It
3 was the judgment to send it, the judgment to
4 subsequently send others, other behavior that was
5 surrounding that. Erratic behavior that existed.

6 There was an incident down in Miami on
7 Mr. Trump's plane that had been communicated back about
8 an outburst, an interaction that was highly
9 inappropriate. So I just want to be clear that it is
10 not a single tweet. It is the culmination of a series
11 of actions, of which that is important to note, that go
12 to the heart of judgment that is important for any job,
13 especially in communications, but nonetheless the White
14 House.

15 Q. Okay. Help me understand any of these other
16 series of actions that affected her ability to serve in
17 the White House.

18 A. Can you be more specific?

19 Q. You just referenced a series of actions.

20 A. Right. Well, I think, again, there was an
21 incident on Mr. Trump's plane in Miami that I was not
22 present for, it was communicated back, that she began a
23 verbal assault on several staffers on the plane in
24 front of Mr. Trump that got communicated back to me
25 that was -- he took note of it as well. Again, he

1 didn't communicate that to me; others did.

2 There was a series of just, as I said, I
3 think, interactions and judgment calls that I didn't
4 feel as those were appropriate.

5 Q. Okay. Did Mr. Miller communicate that to you
6 about the outburst?

7 A. No.

8 Q. Who did?

9 A. I believe Ms. Hicks.

10 Q. Okay. Is the campaign -- I don't want to
11 know of any communications between you and your
12 attorney --

13 A. One more point. I'm sorry. One more thing.
14 I think, obviously, it's now -- it's come out in
15 public, but Ms. Delgado had a restraining order placed
16 against her that was still in effect. That would have
17 -- I don't see any scenario where anybody with a
18 restraining order that was currently violating -- she
19 was travelling to New York in violation of that, that
20 would have -- I don't see any way in which, at least in
21 my experience, something like that would have allowed a
22 security clearance to be issued.

23 But again, it's more than a security
24 clearance. Remember, as I mentioned, there is a
25 counsel vetting aspect of this as well, which goes to

1 suitability for the job and judgment, etc.

2 Q. When did you find out about the alleged
3 restraining order?

4 A. I don't recall.

5 Q. Okay. Do you know whether it was after 2018?

6 A. I can't be certain of the exact timeframe.

7 Q. Do you know whether you knew of that while
8 you were still at the White House?

9 A. I did not.

10 Q. Okay. Were you involved in any way in a
11 decision of employment -- well, back that up. Do you
12 know who Jessica Denson is?

13 A. No.

14 Q. Makes that question a lot easier. I don't
15 want to know of any communications between you and your
16 attorney in the response to this. I'm trying to think
17 how to best ask it. Do you know if your legal
18 representation is being paid for by the campaign?

19 THE WITNESS: Jared, can you --

20 MR. BLUMETTI: Just to the extent you know,
21 Sean.

22 THE WITNESS: Honestly, I -- the truth is,
23 I'm not trying to hide -- I can't remember who's
24 -- I believe it's the campaign.

25 MR. PHILLIPS: Okay. Jared, I'm not asking

1 to pick on you. I just didn't hear what you said.

2 MR. BLUMETTI: I said to the extent he knows,
3 he can answer.

4 MR. PHILLIPS: Fair enough.

5 BY MR. PHILLIPS:

6 Q. Okay. Have you read any of Ms. Delgado's
7 prior depositions?

8 A. With respect to this case?

9 Q. Any case.

10 A. Yes.

11 Q. Which ones?

12 A. There was one involving a paternity case with
13 her and Mr. Miller.

14 Q. Why did you read it?

15 A. I believe he shared it.

16 Q. Okay. In what context did he share it?

17 A. It was very -- something of the effect of,
18 just giving you an update on what I'm dealing with.

19 Q. Okay. When did that happen?

20 A. A year ago?

21 Q. Okay. How did he communicate that deposition
22 to you?

23 A. I'm not really -- I can't remember the
24 platform, if it was -- it was something that
25 disappeared, but -- you know what I mean? I don't

1 remember -- this isn't -- so it could have been an app,
2 but I can't remember which one. But it was something
3 that you had X hours to read and then it disappeared.

4 Q. I can't remember whether it was in Fire and
5 Fury or Fear, which I'm sure you love both, but in one
6 of those books there's a discussion about you being
7 critical of the use of those apps. Tell me about that.

8 A. Well, I'm critical of them in the -- again, I
9 can't remember the reference in either book, but I will
10 tell you that my concern at the time was the White
11 House Records Act. It was very clear that
12 communications within the White House must be
13 discoverable. You could not do things, conduct
14 official U.S. business, on platforms or any mechanism
15 that shielded them from being captured by the
16 Presidential Records Act. And my concern was that many
17 people were acting outside of the guidelines of the
18 Records Act and subjecting us to potential violations.

19 Q. Okay.

20 A. To be clear to your statement, I don't -- in
21 fact, I would encourage people. I believe that whether
22 it's WhatsApp or Signal, they should use things to
23 better encrypt their information. I don't think that
24 you should do that in violation of U.S. government
25 policies and law.

1 Q. But to the extent that I wanted to obtain the
2 communications related to Ms. Delgado between you and
3 Mr. Miller, how are you going to respond to that?

4 A. I don't know. This is -- I'm not a tech
5 person. So I don't know what I'm -- again, that's
6 more -- with all due respect, that's sort of -- I don't
7 know the answer to the question you're asking because
8 I'm not -- I am not a purveyor -- like, I don't -- I
9 don't know much about how these things operate.

10 Q. Okay. Obviously, there's phone calls, right?
11 We're about the same age. We got by with corded
12 phones, okay. And so now we've got the ability to call
13 people, the ability to text on standard phone lines,
14 phone numbers. And then there's a series of apps that
15 allow DMs, and then there's encryption apps.

16 I guess my question is, in what manners do
17 you communicate or have you communicated with Jason
18 Miller about Ms. Delgado? On what platforms?

19 A. Well, the phone, which we previously
20 discussed. Again, I'm not sure what app this was. So
21 I don't know -- as I said, I'm not a purveyor of them.
22 I mean, I have, so I don't know. I don't believe we
23 have communicated via e-mail about her ever,
24 although -- and then I don't know about text. I mean,
25 yeah. So I can't -- yeah. That's probably -- I think

1 I'm answering your question.

2 Q. Are you aware of whether the deposition was a
3 PDF, like a whole deposition, or was it like a screen
4 grab JPEG of a page of a deposition or multiple pages
5 of a deposition? Do you recall how you reviewed it?

6 A. I don't. No, I don't.

7 Q. Do you recall how you responded to his
8 message, something to the effect of, look what I'm
9 still dealing with?

10 A. I probably didn't, knowing this case. I have
11 tried not to respond to anything to do with her just so
12 that -- for obvious reasons.

13 Q. You remain friends with Jason Miller?

14 A. Yes.

15 Q. Do you remain friends with AJ Delgado?

16 A. I never was friends with AJ Delgado.

17 Q. What is Mr. Miller's current employment?

18 A. From my understanding, he works for the Trump
19 2024 campaign, but I'm hardly an expert on Mr. Miller's
20 employment.

21 Q. That's fair. The good news is, I tell people
22 when I'm quiet and turning pages, those are questions
23 I'm not asking. When I'm quiet, so that's good.

24 Do you know whether -- I'll wait for you to
25 drink. Do you know whether Jared Kushner or Ivanka

1 Trump had any role in the decision to retain or not
2 retain Ms. Delgado?

3 A. No, I do not.

4 Q. Were they involved in other White House
5 personnel decisions?

6 A. Oh, I'm sure. None that -- the only one that
7 I ever dealt with with Jared, there was a staffer that
8 he was hiring that had some communications aspect to
9 his role. And that was the only time Jared and I ever
10 discussed employment. I have never discussed
11 employment of anybody with Ivanka.

12 Q. Do you know whether Jared successfully
13 completed his background check at the White House?

14 A. No. I have read media reports, but that's
15 not -- obviously, again, the adjudication of a security
16 clearance is not something I'm involved in.

17 Q. Catherine Frazier. Does that name ring a
18 bell? Obviously, there could be multiple.

19 A. Not from the White House, no.

20 Q. Are you aware of whether Mr. Miller and you
21 ever had a conversation about allegations of him having
22 a workplace affair with Catherine Frazier?

23 A. Oh. Now I know who -- I believe she used to
24 work for Ted Cruz. But I've only -- yeah. No. I'm
25 aware of that, now that you connect the two dots, from

1 a media story, but I've never discussed that with
2 anybody.

3 Q. C-A-T-H-E-R-I-N-E, F-R-A-Z-I-E-R.

4 A. Yeah. On her own, but that's why I thought
5 you were -- it was a White House employee. No. I know
6 where you're going now. No. I have never had any
7 discussions.

8 Q. Okay. I was spelling it for the court
9 reporter too.

10 While you were working for the Executive
11 Office of the President, were you aware of any new hire
12 that was pregnant at the time of hire?

13 A. No. But that would be -- no. But I would
14 never -- that would never be something that would be
15 brought up.

16 Q. Are you aware that Mrs. Delgado was on the
17 list of people retained by the transition team?

18 A. As I said, I wasn't named to the transition
19 team, I think, until it would have been whatever the
20 day after I was named White House Press Secretary. So
21 I was not aware of who was on and who was off, or how
22 they were named.

23 Q. Is there an equivalent list of people that
24 are being considered for these few Comms job in the
25 White House you were talking about? Is there actually

1 a list?

2 A. I'm sorry. So are you saying did we like
3 maintain a list?

4 Q. Yes.

5 A. For the transition?

6 Q. For the White House Comms jobs.

7 A. I think, yeah, Mr. Miller had a list.

8 Q. Okay. Do you know whether Ms. Delgado was on
9 it?

10 A. I believe she was.

11 Q. I think I asked this. Do you know who was
12 hired instead of her, or who else was on the list that
13 --

14 A. No. As I said, there was no instead of. The
15 role that he apparently had discussed with her doesn't
16 exist, so I had to hire for actual jobs that existed
17 with actual qualifications and responsibilities.

18 Q. Okay. Do you recall having a conversation
19 with Ms. Delgado where she told you she would, in fact,
20 love to work in Washington, D.C., and was able to move
21 to Washington, D.C.?

22 A. I do not.

23 Q. Okay. Do you recall having a conversation
24 with Ms. Delgado about raising a small child in
25 Washington, D.C. in which she brought up a nanny?

1 A. I think we discussed this during the first
2 hour. Would you like me to repeat my answer?

3 Q. Please.

4 A. Ms. Delgado had been informed by Mr. Miller
5 that she could work in Miami, and as she expressed to
6 me, it was something that she needed to do because she
7 had family that would be able to care for this. And
8 when I explained to her that these few White House jobs
9 needed to work in the White House, get security
10 clearances, there was materials, there was meetings,
11 the hours such that -- there were not -- it was, at
12 that time, preCOVID. There was no such thing as remote
13 work, especially in the Comms shop.

14 And she inquired how I was able to do
15 something like this, and I explained to her my family
16 situation. I too had two young kids. I know what it's
17 like, so I was very well aware of the demands that
18 existed. And she inquired of me how I could, you know,
19 take on this role in the family situation that I had.
20 And I explained to her how I was able to do that.

21 Q. You also have a supportive spouse?

22 A. Yes, I do.

23 Q. Did she have a supportive spouse?

24 A. I don't know Ms. Delgado's situation.

25 Q. From reading her deposition, was there

1 discussion about whether Jason Miller has been
2 supportive of that child?

3 A. That's not for me to pass judgment on.

4 Q. Has he had conversations with you about child
5 support at all?

6 A. Not like a dollar amount or where things
7 stood. There have been check-in periods where I have
8 just -- same thing: How's everything going? Oh, we're
9 still battling it out, or we're still making it --
10 there's never been a discussion about a number or a
11 payment or -- so does that answer your question?

12 Q. It certainly gives me another one. Why are
13 you having any conversations about Ms. Delgado and
14 Mr. Miller's custody and ongoing issues?

15 A. As I said, I'm not. There are times when
16 he'll just bring up -- I don't quiz him on this. This
17 is -- for obvious legal reasons that we're addressing
18 right now, I don't initiate these conversations. There
19 are times just in the course of a social situation,
20 I'll ask how are things going, which is a very natural
21 conversation to have with somebody. How are you doing?
22 What's going on in your world? And he'll say, well --
23 I mean, we went through that period of time together.
24 As I explained to you, it was an interesting five days
25 around Christmastime of 2016. And I think naturally he

1 defaults to things that we share, our experiences on
2 the campaign. Sometimes that's the nature from time to
3 time. And I would leave that as number twice, three
4 times he may have said, man, it's -- still dealing with
5 this or something like that.

6 Q. What was your -- I guess we talked about
7 that, the number of hours, the number of days, ranging
8 from 2 to 5 days that you worked on kind of quashing
9 this five alarm fire, I think is how you put it.

10 What was your priority there? What were you
11 trying to do?

12 A. I think there were probably two things: The
13 first and foremost was to preserve the integrity of the
14 campaign; meaning, we were talking about the
15 president-elect's policies and priorities, what he was
16 going to do, and this was clearly a massive distraction
17 from that. So that was first and foremost the number
18 one priority is to ensure the messaging and the image
19 of the campaign, the president-elect.

20 And then I think on a second, more human
21 level is to make sure that I shielded both Mr. Miller
22 and Ms. Delgado from reporters that wanted to write
23 about their personal lives. And just on a personal,
24 human level, I wasn't here to pass judgment as much as
25 just to preserve their lives and to make sure that they

1 didn't -- this was Christmas. You know, I wanted to
2 make sure that they could go -- have some degree of
3 privacy. And so by quashing this story, that I think
4 was -- you know, that I was hoping that I was shielding
5 them to some degree.

6 Q. I mean, if Ms. Delgado is sending the tweet,
7 doesn't that mean she didn't want that shield?

8 MR. BLUMETTI: Objection to form.

9 THE WITNESS: Again, I don't know her.

10 BY MR. PHILLIPS:

11 Q. Did she ask you to shield her?

12 A. No.

13 Q. So you were shielding Jason?

14 A. No. I think on a human level there was times
15 in which you realize that somebody is in a position
16 where -- I have been doing this 30 years. There are
17 times when people say things or utter things in the
18 moment which they're frustrated or upset. I recognized
19 that this might be one of those moments. I don't know
20 -- I didn't see any positive that could come out of
21 this for -- so, yeah.

22 Look, you can be critical. She didn't ask
23 for it, but I -- as a human being, do I think it's ever
24 in someone's best interest to have their personal life
25 spread across Page Six? No, I don't. And so if that's

1 what I'm -- is a concern, then I'll take the hit.

2 But as I said, my number one priority was
3 protecting the campaign and the image of the
4 president-elect and the integrity of what we were
5 putting forward in terms of announcing the President,
6 his positions, his priorities, the rollouts and the
7 events that we were having. But on a personal, human
8 level, yeah, I wanted to, as a byproduct, help maintain
9 some of the privacy of those two individuals.

10 Q. Wouldn't the integrity of the campaign
11 already have been exposed when you have a very senior
12 official who's married with children impregnate, in an
13 adulterous affair, his inferior? Isn't that a lack of
14 integrity in a campaign official, namely Jason Miller,
15 within and of itself?

16 MR. BLUMETTI: Objection to form.

17 THE WITNESS: Sure. But there's a big
18 difference between something occurring within a
19 workplace that is inappropriate that is maintained
20 within the confines of that institution, and
21 having something spread out to both national and
22 international news within, what, a month before an
23 inauguration. There's a big difference, yes.

24 Does that distract from the pronouncements,
25 the policy rollouts, all of the other issues that

1 a president-elect is trying to do? 100 percent.

2 There is -- undeniably, that is the case.

3 BY MR. PHILLIPS:

4 Q. I'm pretty sure you wrote a book on this
5 question, but I'm going to ask it anyway. Why did you
6 leave the White House?

7 A. I did write a book. It's called The
8 Briefing. It's available on Amazon and at
9 SeanSpicer.com.

10 Q. I may have an extra copy in my office.

11 A. Thank you. I appreciate it. I left for two
12 reasons: As previously stated, I fundamentally believe
13 that if you're a member of the press or Comms team and
14 you become the story, that you need to get out of the
15 way. And I fundamentally believe through some of my
16 own mistakes as well as some of the actions that the
17 administration had taken that the current situation was
18 untenable.

19 Secondly, as I wrote in the book, I had been
20 performing off and on at various times the positions of
21 Press Secretary and Communications Director. I have
22 noted the difference in responsibilities and roles in
23 both of those positions. And so we had looked for some
24 individuals to take over one or either of the
25 positions. Ultimately, the President decided on the

1 recommendation of some other people to bring in a
2 gentleman by the name of Anthony Scaramucci. I believe
3 that Anthony Scaramucci, while very successful in the
4 world of finance and making media appearances as a
5 surrogate, was highly unqualified to do the job. He
6 had no experience in government. He didn't know the
7 various agencies. He didn't have a background in
8 creating rollout plans. The communications director is
9 the one who coordinates through the various 13
10 departments and their subagencies, independent
11 agencies, to roll out policy pronouncements and
12 coordinate messaging. And if you couldn't name those
13 departments, I'm not sure that you're qualified to lead
14 that position.

15 And so knowing that Mr. Scaramucci's tenure
16 would reflect on me, meaning that the President would
17 look at some of the media attention and lack thereof,
18 and as he's not being qualified for the job, it would
19 have probably fallen to me, I chose to step out of the
20 way.

21 Q. Okay. I guess to that end, you would
22 disagree with Mr. Wolff or Mr. Woodward about how you
23 came to leave the White House?

24 A. Can you enlighten me?

25 Q. Yes. About Trump wanting you out.

1 A. No, no. Just to be clear, Mr. Trump, I
2 think, he -- I'm pretty open with this in my book. I
3 think he had not liked some of the press briefings and
4 some of the interactions. That's true.

5 As I said in answering your questions, I had
6 become the story too often. But even the day I left,
7 Mr. Trump asked me to stay on board. And I write in
8 very -- in detail in that book that you mentioned that
9 I should have taken more of a communications role and
10 less of a public facing role. I think Mr. Trump had a
11 problem with the job I was doing as Press Secretary. I
12 understood that, but I think -- I can't recall how Mr.
13 Wolff or Mr. Woodward ended their book, but Mr. -- I
14 left on great terms with him.

15 I think that the nature of the job, and this
16 is kind of what this all stems on, is I think there
17 was -- probably I should have had more of a
18 communications director role and less of a press
19 secretary role.

20 Q. Okay. In one passage -- I think it's Wolff,
21 W-O-L-F-F, for the court reporter -- asked the
22 question, probably rhetorical, "Or in Jared and
23 Ivanka's view, in his family's defense, what does
24 Spicer's 40-member comm staff actually do was a
25 persistent First Family question."

1 And the reason I wrote down to ask that about
2 that was because it says 40 member comm crew or 40
3 member comm staff. How big was the Comms staff?

4 A. So as I mentioned, the press staff was 12,
5 I'd say the Comms staff was probably 25. I think if
6 you add those two together, you get 37-38. I think
7 that's -- again, this goes back to a fundamental lack
8 of understanding of how government worked by a lot of
9 people who didn't fully understand some of the
10 machinations that -- and then, frankly, as I mentioned
11 in describing the roles of the two offices, the Comms
12 shop isn't a forward-facing -- it's a lot of planning,
13 it's a lot of rollouts, it's a lot of coordination.

14 And I think for a lot of people who haven't
15 been involved in government, they would look at some of
16 these folks and say, well, what does so and so do? Not
17 realizing that rolling out a revision to the Tax Code
18 doesn't just happen with one person, calling one
19 reporter. And so that would be my answer to that.

20 Q. Yeah.

21 A. And I would just say for the record, Mr.
22 Wolff's book in particular has been highly, highly
23 debunked in several areas for misleading and false
24 statements.

25 Q. And nor am I trying to bolster. Okay.

1 A. You did very well.

2 Q. Thanks. It's -- you and I in another life
3 can have beers and talk about the craziness of all of
4 this. It's not for today. But I think it's pretty
5 common knowledge that I represented Omarosa in her case
6 against the campaign. It's been interesting.

7 But the craziness about Wolff's and
8 Woodward's books, and I think it was probably
9 intentional, is they put a word index in the back so
10 when you've got books on shelves and you can just look
11 up Spicer and pull up the passages, it makes life a lot
12 easier on a busy attorney.

13 But as I was looking through the passages
14 trying to get a foundational knowledge and picture,
15 while not being naive, a 40 member Comms staff, right,
16 it's kind of why I highlighted that. Where did the 40
17 people fit? Do they all work in Washington, D.C.?

18 A. Every one of them, yeah. They work in the
19 old executive office building. In fact, I would argue
20 if you look historically, the Trump Comms shop, at
21 least during my tenure, was smaller than Obama, Bush.

22 I think you can go back -- I don't know where
23 we ended up, but we got squeezed. We lost bodies,
24 historically speaking. And again, as I mentioned, I
25 don't have an org chart in front of me, but when you

1 think of the prep that it takes communication-wise, as
2 I mentioned, you're talking about 12 departments. The
3 Department of Defense, the Department of Agriculture,
4 the Department of Health & Human Services, independent
5 agencies like the Security Exchange Commission, all who
6 have announcements or activities, travel that has to be
7 coordinated. Sometimes it's just with the White House,
8 sometimes it's interagency. There are big decisions
9 that boil up that deal with massive pronouncements of
10 U.S. policies and actions.

11 I would argue my staff at the White House --
12 excuse me, at the RNC in Washington was 90. If you
13 talk about Comms shops, you are talking about 25
14 people. Just the internal deliberations within the
15 White House, never mind the outside, they are a very
16 nimble shop. There is no meat on the bone there.

17 Q. To the extent Wolff's talking about Jared and
18 Ivanka, for lack of a better way to enunciate it, being
19 critical of the Comms shop, was that something you
20 experienced?

21 A. I experienced it through rumor, never
22 directly.

23 Q. Okay. Did it affect how you operated?

24 A. Not really. I mean, obviously, when you hear
25 criticism, I don't think that many people are not

1 immune to it, but I did my job every day to the best of
2 my capabilities, and I had, for the most part, an
3 extremely dedicated staff that was very talented and
4 experienced.

5 Q. Okay. There's a tab in my binder called
6 Scaramucci. I'm afraid to even look at it. I think we
7 have covered it.

8 Let me do this: It's 11:37. Let me do one
9 more ten-minute break, and it will certainly be my
10 last. I'm still trying to get us out around lunch.

11 A. What time do you eat lunch, sir?

12 Q. It usually starts with a 12. My plan is to
13 get you out of here by 1:30, and I think it might be
14 substantially shorter.

15 A. Okay. I thought we had agreed to 12:30 prior
16 to this.

17 Q. I think 12:30 should work, but I need -- give
18 me five minutes to get through it and my plan is to get
19 you out maybe even by 12:15.

20 A. Okay. Deal.

21 THE VIDEOGRAPHER: The time is now 11:38 a.m.
22 We're going off the record. This is the end of
23 Media Unit 2. We're off the record.

24 (A recess was taken.)

25 THE VIDEOGRAPHER: The time is now 11:46 a.m.

1 We are back on the record. This is the beginning
2 of Media Unit 3. Please continue.

3 BY MR. PHILLIPS:

4 Q. Do you recall having any conversations with
5 Donald Trump about Ms. Delgado?

6 A. Never.

7 Q. Do you recall ever seeing them -- anything
8 about seeing them interact stand out to you?

9 MR. BLUMETTI: Object to the form.

10 THE WITNESS: No.

11 BY MR. PHILLIPS:

12 Q. Have you had any conversations with Sean
13 Hannity about Ms. Delgado?

14 A. Never.

15 Q. Chris Hayes?

16 A. Who?

17 Q. Chris Hayes.

18 A. I've never spoken to --

19 Q. Yeah.

20 A. Actually, that's not true. No, I have not
21 ever had a conversation.

22 Q. I should just keep going left.

23 A. Sure.

24 Q. Did you ever tell or communicate to Ms.
25 Delgado in any way that her tweets disqualified her

1 from White House employment?

2 A. Yes. There was a conversation and I can't --
3 I'm trying to remember the full nature of where -- she
4 had threatened to send more tweets or go -- and I had
5 sort of said the best way to deal with this is that we
6 had retained counsel and that to express concerns
7 through counsel, but -- so I made it clear to her that
8 public pronouncements over this were not helpful going
9 forward.

10 Q. Well, and saying something is the best way is
11 kind of offering them advice and a way out, isn't it?

12 MR. BLUMETTI: Object to the form.

13 THE WITNESS: I'm unclear. A way out to
14 what, sir?

15 BY MR. PHILLIPS:

16 Q. You said the best approach or the best way --

17 A. Yes, because Ms. Delgado, in the e-mails that
18 you referenced earlier, had expressed concern over how
19 this was being handled. We had retained counsel to
20 make sure that her concerns were addressed. And my
21 point to her was if you have concerns, you know, you
22 have asked us to -- it was on her. She had asked us to
23 deal with it, meaning, collectively, senior members of
24 the team. We had addressed those concerns by retaining
25 counsel and advised her to express concerns with

1 counsel. But when she had expressed to me a desire to
2 tweet or publicly vent further, I relayed to her that I
3 thought the better approach was to go through the
4 proper channels that had been established, that she had
5 requested, by the way.

6 Q. The counsel that was retained was not for
7 her, correct? It wasn't for -- it wasn't an attorney
8 for her?

9 A. Well, in the same way that when you go to
10 your company's HR, that HR isn't for you. I mean, I
11 don't know. I'm not a lawyer. I'm not an HR expert.
12 I mean, my assumption is that they're there to address
13 the concerns. That was what Mr. Drieband was brought
14 on board to do.

15 Obviously, a transition adviser, which was
16 what I was, is not capable of handling legal employment
17 concerns nor HR issues that had been expressed by Ms.
18 Delgado. So what I want to be clear on is that whether
19 it was a campaign or an office, we were ensuring that
20 she was speaking to the appropriate person to deal with
21 her concerns.

22 Q. To what end? Like, I guess what was -- and
23 it may be the same answer that I think is appropriate.
24 That's the legal side. I don't know. But I guess my
25 question is: From Mr. Drieband's role in this, what

1 changed? What findings did he have or conclusions?

2 A. Again, that's not -- I don't know that that's
3 his to share with me, or I mean -- I want to be clear.
4 Ms. Delgado, through e-mails and other communications,
5 expressed concerns about how her situation was being
6 addressed and asked us to treat it in a serious manner.
7 We retained somebody who was properly equipped to
8 address and understand that scenario from an HR
9 employment standpoint. That's frankly where, from my
10 end, it ended; meaning that I'm not equipped to handle
11 HR concerns. I'm not an HR professional or an
12 attorney.

13 And so as she would continue to communicate
14 with me, on the advice of counsel I steered her back to
15 where she had asked to go, i.e., she wanted somebody
16 to -- she wanted a mechanism to address concerns. Me
17 not being in a situation to do that, I was doing
18 everything in my power to get it back to somebody who
19 was appropriately able to do that.

20 Q. Are you aware of any White House policy
21 changes as a result of her complaints?

22 A. She didn't work for the White House.

23 Q. Okay. Are you aware of any campaign,
24 transition, or White House policy changes that occurred
25 as a result of this?

1 MR. BLUMETTI: Objection to form.

2 THE WITNESS: No, I'm not. But as I
3 mentioned, I was not an employee of the campaign,
4 and I was brought on late as an adviser to the
5 transition.

6 BY MR. PHILLIPS:

7 Q. I guess what I'm trying to understand is as
8 to what could be achieved from her speaking to this
9 lawyer from the standpoint of what was intended by you
10 or whoever tasked this lawyer to talk to her.

11 MR. BLUMETTI: Object to form.

12 THE WITNESS: Again, I'm sorry if we're
13 talking past each other on this. The e-mails that
14 were sent by Ms. Delgado expressed concerns about
15 her employment situation and issues that she
16 raised. I'll speak for myself, as I have, and
17 said I was not in a position either of authority,
18 because I was an adviser, nor professionally to
19 address those concerns. And so we retained
20 somebody who was.

21 It was not -- I just -- I'm almost finding
22 the question a little backwards, which is she's
23 the one asking for somebody to address the
24 concerns. Knowing that I'm not equipped, we bring
25 somebody in, and you're asking what that person

1 can do. Again, I think that's either a question
2 for him or for someone else in another field, but
3 not for me.

4 BY MR. PHILLIPS:

5 Q. And I guess I was trying to see what -- Jason
6 resigns. There was no way to terminate Jason. What
7 else --

8 A. I don't know. That's again a question for
9 Ms. Delgado. Not for me.

10 Q. Okay. And this all started because of me
11 asking whether you ever communicated to her that she
12 was disqualified as an employee of the Executive Office
13 of the President or White House.

14 A. Again, I've stated over and over again, I
15 don't think that she was qualified from the get-go, so
16 there was no disqualifying. It was, I would have never
17 recommended her for a position to begin with.

18 Q. There were a lot of people, including, I
19 think, you've discussed Mr. Scaramucci, who were
20 retained by the White House, who didn't meet your
21 standards or qualifications.

22 A. Correct. Some I had -- I mean, there were
23 plenty of people recommended to me during my tenure to
24 be hired that I chose not to hire or recommend. There
25 were people that didn't get hired. And then there were

1 people that got brought in like Mr. Scaramucci who
2 because I couldn't make a difference, I chose to step
3 down.

4 Q. Okay. You talked about an incident on a
5 plane reported to you by Hope Hicks. Do you recall an
6 incident between Corey Lewandowski and Hope Hicks where
7 there was like a screaming argument between the two?

8 MR. BLUMETTI: Objection to form.

9 THE WITNESS: I do not.

10 BY MR. PHILLIPS:

11 Q. Did you inform Ms. Delgado that -- strike
12 that.

13 At any point in your communications,
14 particularly text communications with Ms. Delgado, did
15 you ever explain to her that she in any way did not
16 qualify for White House employment?

17 MR. BLUMETTI: Objection to form.

18 THE WITNESS: I don't believe over text that
19 would have been a discussion.

20 BY MR. PHILLIPS:

21 Q. Or e-mail?

22 A. If you have something that sheds light on
23 this, but I don't recall anything in any -- any of
24 those communications.

25 Q. Okay. I mean, my review of the e-mail, and I

1 don't know that I have everything, but my review of the
2 e-mail shows that you're actually trying to assist Ms.
3 Delgado with finding employment even if it's not in the
4 White House. Do you disagree with that?

5 MR. BLUMETTI: Objection to form.

6 Mr. Phillips, can you show the witness the e-mail
7 if you're going to give him your interpretation of
8 it?

9 BY MR. PHILLIPS:

10 Q. The Politico story, do you know who brought
11 this, this whole affair thing to Politico's attention?

12 A. Could you enlighten me what Politico -- which
13 story are you referring to and --

14 Q. Yeah. Do you know who brought -- so before
15 Delgado's tweet, did you have any media requests
16 related to a potential affair or issue involving
17 somebody in the campaign at a high level?

18 A. Not that I'm aware of. What story are you
19 referring to? What's the date and the reporter?

20 Q. So Plaintiff's 91, which I don't have
21 scanned, is an e-mail from AJ to Steve Bannon and Jason
22 Miller. It states: "I just received a call from Jason
23 that five to six reporters were e-mailing saying he and
24 I are having an affair. Politico's Alex just called
25 and Jason believes this is Corey and Hope's doing.

1 E-mail to reporters even said this is why staff rollout
2 announcements (Jason's) are delayed." It's Plaintiff
3 91.

4 You weren't listed on this e-mail, so I don't
5 even know what showing it to you would do, but were you
6 aware before the tweet --

7 A. No.

8 Q. -- that this was all churning up?

9 A. I was not.

10 Q. I think we talked about your book and the
11 mentioning about whether you knew about a DUI. Do you
12 know whether it was one or more than one DUI?

13 A. Just to be clear, you weren't talking -- my
14 book is -- my first book is The Briefing.

15 Q. Her book.

16 A. Correct. You're referring to Ms. Grisham's
17 book?

18 Q. Yes. In Ms. Grisham's book, do you know
19 whether it was one DUI or more than one DUI that she
20 had?

21 A. I believe according to her account, she had,
22 I think, two. But again, I only was made aware of this
23 in the publication of her book.

24 Q. One thing about me is I get hangry, so I'm
25 trying to get done in ten minutes and getting a little

1 hungry, so I apologize if I'm --

2 A. Don't worry.

3 Q. I'm trying to get you out as promised. Text
4 messages, we have covered that. Will you agree with me
5 that as late as January 2017 you were trying to assist
6 Ms. Delgado with employment in a campaign?

7 MR. BLUMETTI: Objection, form.

8 THE WITNESS: I think I had given her some
9 options. As I stated earlier, staying on the
10 campaign payroll was an option. But just to be
11 clear, I had also advised her I was not in a
12 position -- I didn't work for the campaign. I
13 didn't have the authority to offer her a job or
14 help her. I said that I could be helpful, which I
15 could be.

16 BY MR. PHILLIPS:

17 Q. Okay. Is there any text or e-mail that you
18 can point to whatsoever where you tell Ms. Delgado she
19 does not have a White House job?

20 A. No. All of the conversations that we had
21 pertaining to employment were verbal. And again, it
22 was more she telling me what Mr. Miller had promised
23 her, specifically the location where she would work
24 from, and me explaining why that wasn't going to --
25 that there was no scenario where that would happen.

1 Q. Isn't that exactly why sexual harassment in
2 the workplace is inappropriate because people make
3 promises that they may not intend to keep, but they're
4 making promises for their own sexual gratification?

5 A. I have never engaged in sexual harassment, so
6 I don't know why people do.

7 MR. PHILLIPS: Okay. That's all the
8 questions I have. Thank you, Mr. Spicer. I
9 appreciate it.

10 THE WITNESS: Thank you. Pleasure. Thank
11 you, guys.

12 THE VIDEOGRAPHER: The time is now 12:05 p.m.
13 This concludes the videotape deposition of
14 Mr. Spicer. The total number of media units used
15 was three and will be retained by Veritext Legal
16 Solutions. Again, the time is 12:05 p.m., and we
17 are off the record.

18 (The following colloquy took place off the
19 video record.)

20 THE COURT REPORTER: Okay. Read or waive?

21 MR. PHILLIPS: You have the right to read
22 this transcript for any inaccuracies or errors.
23 If you make a substantial change, I'll get to
24 redepose you of the change, or you can waive that
25 right. Usually your counsel kind of helps you

1 with that decision.

2 THE WITNESS: Okay.

3 MR. PHILLIPS: Or not. Do you want to read
4 or waive?

5 THE WITNESS: Oh. Jared, unless you have a
6 -- we have a video.

7 MR. BLUMETTI: We're going to review. We're
8 going to request a paper copy of the transcript,
9 and we don't need the videotape portion of it to
10 the extent it's being recorded. Just the
11 transcript, which we'll review and send to
12 Mr. Spicer and we'll respond.

13 THE COURT REPORTER: Okay. Mr. Phillips,
14 would you like to order?

15 MR. PHILLIPS: Yes.

16 THE VIDEOGRAPHER: Mr. Phillips, are you
17 ordering the video at this time?

18 MR. PHILLIPS: No video at this time.

19 THE COURT REPORTER: Mr. Blumetti, would you
20 like a copy as well?

21 MR. BLUMETTI: A copy of the transcript,
22 please.

23 (Deposition concluded at 12:05 p.m.)
24
25

CERTIFICATE OF OATH

STATE OF FLORIDA

COUNTY OF ORANGE

I, the undersigned authority, certify that SEAN M. SPICER personally appeared before me and was duly sworn.

WITNESS my hand and official seal this 27th day of July, 2023.

A handwritten signature in cursive script, reading "Lee Ann Reid", is written over a horizontal line.

Lee Ann Reid, Registered
Professional Reporter
Notary Public - State of Florida
My Commission Expires: 7/16/2027
Commission No.: HH 387767

REPORTER'S CERTIFICATE

STATE OF FLORIDA :
COUNTY OF ORANGE :

I, Lee Ann Reid, Registered Professional Reporter, certify that I was authorized to and did stenographically report the deposition of SEAN M. SPICER; that a review of the transcript was requested and that the transcript is a true and complete record of my stenographic notes.

I further certify that I am not a relative, employee, attorney, or counsel of any of the parties, nor am I a relative or employee of any of the parties' attorneys or counsel connected with the action, nor am I financially interested in the outcome of the foregoing action.

Dated this 27th day of July, 2023, IN THE CITY OF ORLANDO, COUNTY OF ORANGE, STATE OF FLORIDA.

A handwritten signature in cursive script, reading "Lee Ann Reid", is written over a horizontal line.

Lee Ann Reid, Registered Professional Reporter

ERRATA SHEET

PLEASE ATTACH TO THE DEPOSITION OF SEAN M. SPICER TAKEN
ON JULY 17, 2023 IN THE CASE OF ARLENE DELGADO V.
DONALD J. TRUMP FOR PRESIDENT, INC., SEAN SPICER,
individually, REINCE PRIEBUS, individually, and STEPHEN
BANNON, individually.

PAGE	LINE	CORRECTION AND REASON THEREFOR
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I HAVE READ THE FOREGOING PAGES AND, EXCEPT FOR ANY
CORRECTIONS OR AMENDMENTS INDICATED ABOVE, I HEREBY
SUBSCRIBE TO THE ACCURACY OF THIS TRANSCRIPT.

SEAN M. SPICER	DATE
----------------	------

WITNESS TO SIGNATURE	DATE
----------------------	------

1 JULY 27, 2023
2 SEAN M. SPICER
C/O JARED E. BLUMETTI, ESQUIRE
3 LaRocca, Hornik, Rosen & Greenberg LLP
The Trump Building
4 40 Wall Street, 32nd Floor
New York, New York 10005
5 Re: JULY 17, 2023 DEPOSITION OF SEAN M. SPICER
ARLENE DELGADO V. DONALD J. TRUMP FOR
6 PRESIDENT, INC., SEAN SPICER, individually,
REINCE PRIEBUS, individually, and STEPHEN BANNON,
7 individually.

8 Dear Sir:

9 This letter is to advise that the transcript of
the above-referenced deposition has been completed
10 and is available for review. Please contact our
office at (800)275-7991 to make arrangements to read
11 and sign or sign below to waive review of this
transcript.

12
13 It is suggested that the review of this
transcript be completed within 30 days of your
receipt of this letter, as considered reasonable
14 under Federal Rules*; however, there is no Florida
Statute to this regard.

15
16 The original of this transcript has been
forwarded to the ordering party and your errata, once
received, will be forwarded to all ordering parties.

17
18 Sincerely,

19 Lee Ann Reid, RPR
Veritext Legal Solutions

20 cc: John M. Phillips, Esquire

21 WAIVER:

22 I, _____ hereby waive the reading &
signing of my deposition transcript.

23 _____
Deponent Signature

Date

24
25 *Federal Civil Procedure Rule 30(e)/Florida Civil
Procedure Rule 1.310(e)

[& - acceptable]

Page 104

&	1:00 25:13	22nd 12:10	5
& 2:2,5,9 4:7 7:16 86:4 103:3 103:21	1:30 87:13 1st 9:8	23:24 25:7,13 26:13,21,23 27:16 29:11 34:21 57:19	5 78:8
1	2	23rd 34:22 57:19	7
1 1:21 8:14 9:10 26:11 50:25 1.310 103:25 100 2:13 81:1 10005 2:7 103:4 101 2:14 102 2:15 103 1:21 2:16 10:24 50:23 10:36 51:2 10:43 55:8 10:44 55:11 11764 1:4 3:9 11:37 87:8 11:38 87:21 11:46 87:25 12 40:14 56:1 84:4 86:2 87:12 12/22 27:25 12:05 1:13 98:12,16 99:23 12:15 87:19 12:30 87:15,17 13 82:9 15 51:11 17 1:12 3:3 102:2 103:5 19 1:4 3:9 1990s 22:20	2 7:10 9:14 51:4 78:8 87:23 20 8:9 2014 9:24 2015 9:24 10:6,8 10:17 14:5 2016 10:8 12:2 12:17 13:24 14:5,6,10 16:12 23:13 48:3 77:25 2017 8:11 9:8,10 9:15,19 18:9 21:18 28:18 32:18 97:5 2018 7:10,20 8:11 9:19 68:5 2022 29:11 2023 1:12 3:3 100:11 101:13 102:2 103:1,5 2024 72:19 20th 26:3,15 21 18:9 21:18 212 2:3 21st 9:8 11:18 18:3,20 23:24 25:7 26:13,16 30:22,24 31:2 33:5 37:22 39:22 63:19	24 9:1,5 19:25 21:4 26:3,6,9 24/36 25:4 25 65:15 84:5 86:13 25004 100:15 101:17 27 103:1 275-7991 103:10 27th 100:10 101:13 28 32:17 281 48:3	7/16/2027 100:17 72 58:4,11
			8
			800 103:10
			9
			90 55:1 86:12 91 95:20 96:3 96 58:11 99 28:23 9:03 1:13 3:2
			a
			a.m. 1:13 3:2 50:23 51:2 55:8 55:11 87:21,25 ability 66:16 71:12,13 able 30:24 41:25 42:23 44:7 56:7 75:20 76:7,14 76:20 91:19 above 102:20 103:9 absolutely 43:4 52:4 abundantly 59:3 accept 40:23 acceptable 30:9
		3	
		3 88:2 30 48:2 79:16 103:13,24 32202 2:3 32nd 2:6 103:4 37-38 84:6 387767 100:18	
		4	
		4 2:12 47:2 40 2:6 56:21 83:24 84:2,2 85:15,16 103:4	

[access - apparently]

Page 105

access 56:20 accommodati... 43:12,14 account 64:9 96:21 accuracy 102:20 accusations 49:8 achieved 92:8 acknowledged 48:15 act 44:7 70:11 70:16,18 acting 70:17 action 58:15 101:11,12 actions 57:18 59:6 62:3,9,11 66:11,16,19 81:16 86:10 actively 62:12 activities 10:20 14:16 86:6 actual 32:10 75:16,17 actually 8:15 17:22 34:17 46:13 74:25 83:24 88:20 95:2 add 84:6 address 29:2 34:23 48:23 90:12 91:8,16 92:19,23	addressed 48:14 89:20,24 91:6 addressing 77:17 adjudicated 39:14 64:10 adjudication 73:15 administration 14:9 81:17 adulterous 80:13 adultery 36:6 advance 54:12 advice 34:5 89:11 91:14 advise 103:9 advised 89:25 97:11 adviser 12:12 90:15 92:4,18 affair 73:22 80:13 95:11,16 95:24 affect 86:23 affected 66:16 affiliated 22:9 affiliations 4:1 39:9 afraid 87:6 age 71:11 agencies 82:7,11 86:5 agent 44:7	ago 61:5 69:20 agree 5:19 97:4 agreed 3:23 87:15 agreement 13:5 agriculture 86:3 aguirre 45:25 ahead 54:13 aides 38:18 39:21 aj 12:15 21:7,10 38:16 50:10 57:6 72:15,16 95:21 aj's 59:4 alan 2:10 3:12 alarm 35:12,14 78:9 alcohol 39:18 alex 95:24 allegations 63:12 73:21 alleged 68:2 allow 71:15 allowed 67:21 amazon 81:8 amendments 102:20 america 8:18 31:22 32:5,19 american 19:15 amount 77:6 analysis 65:20 ann 1:18 3:15 100:16 101:6,17	103:18 announced 26:4 announcement 26:24 27:25 announcements 35:8 86:6 96:2 announcing 80:5 answer 5:9,23 6:24 10:4 11:2,7 14:12 15:5,6 17:9 18:23 55:16 64:22 69:3 71:7 76:2 77:11 84:19 90:23 answered 8:8 41:7 answering 72:1 83:5 anthony 82:2,3 anti 46:1 anybody 27:19 30:7,10 37:10 38:11 57:17 62:7 67:17 73:11 74:2 anyway 81:5 apologize 26:1 97:1 app 70:1 71:20 apparent 10:6 apparently 75:15
--	--	--	--

[appear - based]

Page 106

appear 12:22 20:18	arm 32:6	assumed 31:5 44:19	72:2 73:20,25 74:11,16,21 76:17 91:20,23 95:18 96:6,22
appearances 2:1 82:4	arrangements 103:10	assumption 90:12	b
appeared 100:7	article 45:24	attach 102:2	
application 39:5	asked 4:16 14:4 16:16 18:10,17 30:1 31:15 32:23 35:16 42:22 54:11 75:11 83:7,21 89:22,22 91:6 91:15	attention 45:2 82:17 95:11	b 2:17 47:9
apply 22:12	asking 10:12,14 24:3,15 35:11 47:4 56:5 60:6 61:23 68:25 71:7 72:23 92:23,25 93:11	attorney 2:4,7 4:4 5:1 47:10,11 48:5 67:12 68:16 85:12 90:7 91:12 101:10	baby 23:25 24:11,14 42:16
appointed 17:24	aspect 18:8 67:25 73:8	attorneys 101:11	back 6:3 7:25 10:7 11:15 18:22 20:20 21:15,22 29:3 51:3 55:12 59:25 65:18 66:7,22,24 68:11 84:7 85:9 85:22 88:1 91:14,18
appointments 18:9	assault 66:23	audible 3:21	background 11:1,12 33:15 38:9,11 39:1 48:18 63:23 64:2 73:13 82:7
appreciate 81:11 98:9	assets 57:4	audiences 19:6	backgrounding 62:4,13
appreciated 56:7	assigned 54:8	audio 3:22	backwards 92:22
approach 89:16 90:3	assist 14:24,25 95:2 97:5	august 12:17 14:6,10,18	ballpark 16:15
appropriate 37:9 51:17 52:2 67:4 90:20,23	assistance 20:19	authority 92:17 97:13 100:6	bannon 1:7 3:8 61:15 95:21 102:4 103:6
appropriately 91:19	assistant 40:15	authorized 101:7	base 31:17
approximately 7:13 25:13 26:12	assistants 40:17	available 81:8 103:10	based 30:13 60:10
apps 70:7 71:14 71:15	associates 10:9 39:16	aware 12:14,19 13:4,8 23:17,21 25:22 32:2 33:17,18,22 34:11 37:12 38:8 39:1 45:14 60:17 63:8,10 63:15 64:9,12 64:16 65:15	
archives 28:20	assume 5:24 7:22 16:25 18:2 28:12 33:18 47:12		
areas 84:23			
argue 85:19 86:11			
argument 94:7			
arizona 57:3			
arlene 1:2 2:8 3:5 102:2 103:5			

[basic - called]

Page 107

basic 42:12 basically 19:25 23:9 bates 48:3 battling 77:9 bear 63:22 bearing 39:8 becoming 59:16 beers 85:3 beg 62:6 began 11:17 18:21 24:15 66:22 beginning 51:3 88:1 behalf 3:13,15 4:7 7:3 behavior 30:8 30:10 39:16 43:16 66:4,5 believe 7:11 9:22 12:21 13:16 22:20 24:11 25:17 26:15 28:1,7,11 31:3,4 32:6 33:12 34:4 41:14 43:17,24 45:20 47:4,7,18 60:9 64:6 65:2 67:9 68:24 69:15 70:21 71:22 73:23 75:10 81:12,15 82:2 94:18	96:21 believes 29:9 95:25 bell 73:18 best 9:11,16 12:16,20 22:19 26:8 43:8 46:17 48:20 68:17 79:24 87:1 89:5 89:10,16,16 better 5:16 6:1 13:1,22 56:16 70:23 86:18 90:3 beyond 21:4 34:11 37:22 big 16:21 19:19 26:23 80:17,23 84:3 86:8 binder 87:5 bit 51:8 53:8 56:17 blackmail 39:18 blowing 52:12 blumetti 2:5 4:6 4:6 10:3 14:11 15:3,5,8 17:8,16 23:8 29:13 30:4 36:9,25 37:7,17 41:6 44:15 45:4 47:15 49:14 50:21 51:24 52:14 53:20 55:4 58:25 68:20 69:2 79:8	80:16 88:9 89:12 92:1,11 94:8,17 95:5 97:7 99:7,19,21 103:2 blunt 34:12 bluster 5:12 board 83:7 90:14 boca 9:23 bodies 85:23 body 60:23 61:18 boil 86:9 boiling 65:18 bolster 84:25 bone 86:16 book 7:5 59:11 64:7 70:9 81:4,7 81:19 83:2,8,13 84:22 96:10,14 96:14,15,17,18 96:23 books 70:6 85:8 85:10 boss 36:2 48:11 bottom 24:22 boza 44:25 brand 55:14 break 6:6 48:1 50:13,19 87:9 brian 31:24,25 32:18 briefing 81:8 96:14	briefings 21:2 83:3 bring 77:16 82:1 92:24 bringing 54:20 brought 48:5 74:15 75:25 90:13 92:4 94:1 95:10,14 building 2:6 85:19 103:3 built 58:5 bunch 4:19 bureaucracy 55:24 bush 85:21 business 7:6,10 7:23 8:11 10:1 22:22 23:4 70:14 businesses 22:23 busy 85:12 byproduct 80:8
c			
c 7:2 17:25 74:3 103:2 calendar 9:24 call 26:10,23 39:12 44:5 48:4 52:24 54:14 71:12 95:22 callahan 17:1 called 6:16 7:15 8:14 17:25 19:9			

[called - clearly]

Page 108

25:14 81:7 87:5 95:24 calling 10:15 62:20 84:18 calls 28:5,12 58:17 67:3 71:10 calm 56:23 camera 3:19 61:9 cameras 56:13 campaign 6:19 10:22 11:13 12:6,22 13:5 14:9 15:1,16 16:10 17:15 18:5 19:3,4,7,10 21:8 22:2 23:10 23:18,20 27:10 30:16 31:13,17 32:1 34:13,15 35:13,15,22 45:13 47:18 50:1 53:25 54:6 56:11,18 57:4 57:24 60:4,24 61:13 65:1 67:10 68:18,24 72:19 78:2,14 78:19 80:3,10 80:14 85:6 90:19 91:23 92:3 95:17 97:6 97:10,12	campaigns 32:1 candidacy 14:9 candidate 15:23 15:24 16:5 17:13,19 19:12 33:1 35:22 54:9 56:9 57:17 candidates 27:8 capabilities 87:2 capable 90:16 capital 58:13 capitol 22:3,21 38:6 captured 70:15 caputo 63:3 care 50:7 76:7 career 4:17 8:1 case 3:8 11:3 38:2 39:14 56:4 56:11 69:8,9,12 72:10 81:2 85:5 102:2 cases 24:3 58:3 58:10 categories 21:20 catherine 2:9 73:17,22 cc 103:20 cell 52:21 certain 22:21 27:6 55:21 68:6 certainly 6:3 15:13 17:14,21 29:3 77:12 87:9	certificate 2:13 2:14 100:1 101:1 certify 100:6 101:7,10 cetera 21:6 chain 13:1 18:18 chance 5:9 change 15:23 58:13 98:23,24 changed 40:7 91:1 changes 91:21 91:24 channels 90:4 character 39:8 39:10 charge 36:22 chart 45:6 85:25 check 8:10,25 9:13 31:3 32:8 38:9,11 39:1 73:13 77:7 chief 12:2 14:15 33:11 54:2 child 36:4 42:2 75:24 77:2,4 children 80:12 chips 58:5 choices 39:17 chose 82:19 93:24 94:2 chris 88:15,17	christmas 35:7 41:14 57:25 59:4 79:1 christmastime 58:7 77:25 chronologically 7:25 8:21 chronology 11:14 churning 96:8 city 101:13 civil 1:17 3:8 103:24,24 claims 47:14 clarification 24:19 clarify 32:24 61:17 clean 50:14 clear 7:9 8:20 16:13 19:19 21:24 30:5 32:12 42:10 47:4 59:4 61:22 65:10,22 66:9 70:11,20 83:1 89:7 90:18 91:3 96:13 97:11 clearance 22:6 65:4,15 67:22 67:24 73:16 clearances 65:9 76:10 clearly 16:4 27:15 49:20
--	---	--	---

[clearly - consumption]

Page 109

78:16 client 6:20 clients 7:20 close 56:14 closer 56:13 code 84:17 cold 58:1 collectively 89:23 college 64:1,3 colloquially 54:7 colloquy 98:18 come 18:4 26:24 28:21 39:23 45:1 54:18 67:14 79:20 coming 35:20 51:19 comm 83:24 84:2,3 command 13:2 comment 32:9 commented 53:7 comments 51:15 commission 86:5 100:17,18 committed 62:9 62:11 committee 10:21 11:20,22 11:24 14:15 committees 32:1	common 49:12 85:5 comms 18:25 19:2,7,11,16,18 20:11 27:22 32:25 38:16 44:2 61:16 74:24 75:6 76:13 81:13 84:3,5,11 85:15 85:20 86:13,19 communicate 19:13 48:24 67:1,5 69:21 71:17 88:24 91:13 communicated 48:9 66:7,22,24 71:17,23 93:11 communication 43:17 59:14 86:1 communicatio... 11:25 12:3 14:14 19:1,4,6 19:22,23 20:19 20:23 21:3,4,17 22:16 23:18,19 24:1,5,12,13 25:16,18 30:11 30:25 33:25 35:18 37:19,20 38:20 44:4,6 52:3 53:24 56:2 66:13 67:11	68:15 70:12 71:2 73:8 81:21 82:8 83:9,18 91:4 94:13,14 94:24 companies 7:1 company 7:2 36:13 37:1 company's 90:10 complaints 91:21 complete 101:8 completed 73:13 103:9,13 completely 26:25 27:6 complex 42:21 component 32:10 51:8 comprehensible 5:8 concern 10:10 70:10,16 80:1 89:18 concerns 10:16 48:15,19,23 49:21 89:6,20 89:21,24,25 90:13,17,21 91:5,11,16 92:14,19,24 concluded 99:23	concludes 98:13 conclusions 91:1 concurrent 7:23 7:23 8:6,9 conduct 65:17 70:13 conducted 1:11 3:18 conference 4:25 5:17 confidence 59:21 confident 60:3 confines 80:20 congress 64:24 64:25 connect 73:25 connected 101:11 connecting 32:3 connection 3:19 consider 21:14 55:20 58:21 consideration 54:23 considered 27:10 30:7 41:9 74:24 103:13 constraints 43:11 consulting 6:18 7:1 8:9 9:12,15 consumption 58:9
---	--	--	---

[contact - deals]

Page 110

contact 23:7 103:10	correct 8:19 14:4 25:8,23	98:20 99:13,19	cycles 11:24,25 16:6
contacted 47:13	33:21 38:23	covered 87:7 97:4	d
context 69:16	40:9 65:5,21	covering 13:10 56:7	d 2:11 47:9,9
continue 3:22 8:25 51:4 55:12 88:2 91:13	90:7 93:22 96:16	craziness 85:3,7	d.c. 75:20,21,25 85:17
continuing 11:14	correction 102:5	crazy 5:12	daddy 23:25 24:11,14
contractor 23:2	corrections 102:20	create 18:17 44:5	damage 57:22
conversation 5:1 27:20 41:17 64:11 73:21 75:18,23 77:21 88:21 89:2	correlation 49:24	created 57:22	damaging 57:22
conversations 27:4,17 35:9 41:11,13,20 42:4 77:4,13,18 88:4,12 97:20	correspondence 13:20	creating 82:8	dan 25:16 38:20
coordinate 10:20 14:16 82:12	counsel 1:14 3:25 15:10 34:5 36:1 39:6 47:18 48:22 49:17 52:16 67:25 89:6,7,19,25 90:1,6 91:14 98:25 101:10,11	creative 56:23	date 1:12 9:10 26:4 37:23 95:19 102:23,25 103:23
coordinated 86:7	counsel's 65:13	crew 84:2	dated 101:13
coordinates 82:9	counselor 26:1 28:3 43:15 59:7	criminal 39:15 64:5	day 17:5,5 23:15 25:10 29:15 74:20 83:6 87:1 100:10 101:13
coordination 14:22 16:24 84:13	counterpart 23:10	critical 70:7,8 79:22 86:19	days 77:24 78:7 78:8 103:13
copy 81:10 99:8 99:20,21	county 100:4 101:4,14	criticism 45:11 86:25	deal 7:4,5 49:21 58:3 59:9 86:9 87:20 89:5,23 90:20
corded 71:11	couple 40:16,17	cruz 73:24	dealing 5:4 20:1 20:1 21:1 35:6 58:1,19 69:18 72:9 78:4
corey 94:6 95:25	course 18:23 77:19	crystal 65:10	dealings 7:6 10:1
	court 1:1 3:10 3:14 4:1 5:4 6:4 74:8 83:21	cuba 61:17	deals 9:15 19:23
		culmination 66:10	
		current 72:17 81:17	
		currently 6:15 6:16 36:3 45:23 67:18	
		custody 77:14	
		cutting 41:5	
		cv 1:4 3:9	
		cycle 10:8 12:1 15:23,23	

[dealt - disappeared]

Page 111

dealt 58:12 73:7 dear 103:8 debate 10:11,16 debates 10:7 debunked 84:23 decades 58:6 december 12:10 13:21,24 23:24 25:7,13 26:21 26:23 48:2 52:10 57:19 decide 30:3 decided 33:1 81:25 decision 46:5,7 46:8,22 50:4 57:8 68:11 73:1 99:1 decisions 64:20 73:5 86:8 declaring 24:20 dedicated 87:3 deem 62:17 defaults 78:1 defendants 1:8 2:7 defense 83:23 86:3 defer 27:21 40:6 deferred 40:3 degree 64:3 79:2,5 delayed 96:2 delete 28:20,21 29:4	deletes 46:1 delgado 1:2 2:8 3:5 4:5 11:14 12:15,25 21:7 21:10 23:22,23 29:6,11 30:3,8 31:1,15 32:3,18 33:1 34:1,10,22 35:4 38:16,24 40:1,7 41:4,12 41:13 42:5,21 43:13,16 44:14 45:12 47:1,23 48:9 49:8,19,25 50:6,10 51:10 52:19 53:6,9 59:23 63:16 65:3 67:15 71:2 71:18 72:15,16 73:2 74:16 75:8 75:19,24 76:4 77:13 78:22 79:6 88:5,13,25 89:17 90:18 91:4 92:14 93:9 94:11,14 95:3 97:6,18 102:2 103:5 delgado's 47:14 57:6 69:6 76:24 95:15 deliberations 86:14 delineates 19:21	demanding 42:22 43:3 demands 76:17 demeanor 54:10 56:24 59:22 denied 65:9 denson 68:12 department 36:2 54:12 86:3 86:3,4 departments 20:11 82:10,13 86:2 depending 48:16 depends 3:18 6:7 54:25 depo 29:3 deponent 103:23 deposed 4:11 deposition 1:10 3:4,17 4:17,21 4:24 11:6 69:21 72:2,3,4,5 76:25 98:13 99:23 101:7 102:2 103:5,9,22 depositions 69:7 deputies 40:17 deputy 33:11 54:1 57:15 derogatory 46:3 described 48:10	describing 84:11 desire 90:1 detail 83:8 determine 39:3 45:16 64:18 developed 56:5 differ 62:6 difference 16:21 19:20 80:18,23 81:22 94:2 different 4:25 20:11 27:17 32:23 38:23 56:3 dinner 57:25 59:5 direct 2:12 4:12 14:21 37:2 direction 9:20 directly 12:5,8 86:22 director 12:1,3 14:14 20:19,23 21:4 24:1,6,12 24:13 25:16,17 25:18 35:18 37:19 38:16,20 38:21 81:21 82:8 83:18 disagree 82:22 95:4 disappeared 69:25 70:3
--	---	--	--

[discipline - employment]

Page 112

discipline 63:5 discoverable 70:13 discovery 1:15 28:16 discuss 23:13 24:4 31:19 34:5 42:18 65:8 discussed 9:10 42:10 61:24 63:25 71:20 73:10,10 74:1 75:15 76:1 93:19 discussion 31:12 46:23 55:10 58:17 64:8 70:6 77:1 77:10 94:19 discussions 24:7 27:1 34:16 54:18 74:7 dismiss 65:12 disparage 13:9 disqualified 43:1 88:25 93:12 disqualifying 57:20 64:19 65:19,23,23 93:16 distract 80:24 distraction 78:16	district 1:1,1 3:10,10 division 21:16 54:14 divvy 20:4,24 dms 71:15 documentation 26:2 doing 16:5 45:20 46:24 60:4 61:5 77:21 79:16 83:11 91:17 95:25 dollar 77:6 dollman 50:5 dollman's 50:3 don 47:17 48:21 donald 1:5 3:6 9:21 13:10 14:10 51:22 60:18 88:5 102:3 103:5 donor 9:25 dots 73:25 dotted 44:5 drafted 38:17 drieband 47:9 47:10 48:4,24 49:13,18 90:13 drieband's 90:25 drink 72:25 drive 18:5 driven 20:16,17	drug 39:18 drugs 39:17 due 61:4 71:6 dui 96:11,12,19 96:19 duly 4:10 100:7 dumb 18:24 duration 6:5,10 duties 31:5 dwi 64:9,17 e e 2:5,11,17 13:16,18 45:25 46:1,1 47:1,9 48:19 61:15 71:23 74:3,3,3 89:17 91:4 92:13 94:21,25 95:2,6,21,23 96:1,4 97:17 103:2,24,25 earlier 7:19 40:3 53:8 57:14 89:18 97:9 early 8:11 easier 68:14 85:12 eat 87:11 education 64:2 educational 63:23 effect 64:17 67:16 69:17 72:8	effective 56:16 either 8:10 12:23 13:5 15:1 26:15 30:1 37:19 46:11 47:6 70:9 81:24 92:17 93:1 elect 78:19 80:4 81:1 elect's 78:15 elected 19:17,20 election 12:2 17:4,5 23:14 27:15 embroiled 35:18 employ 30:3 employed 6:15 8:17,23 10:21 15:21 21:8 37:13 53:25 employee 12:5,9 18:20 21:11 23:1 29:7,12,15 29:17,20 46:12 46:13 74:5 92:3 93:12 101:10,11 employees 16:10 23:18 27:22 36:14 40:12 60:21 employer 36:1 46:12 63:5 employment 7:7 7:23 8:22 9:9 16:22 22:4,5
---	--	---	---

[employment - extent]

Page 113

25:9 29:16 31:1 32:17 33:2 35:25 38:25 39:22,22 44:11 45:7 47:11 48:5 48:13 50:10 52:16 54:3 68:11 72:17,20 73:10,11 89:1 90:16 91:9 92:15 94:16 95:3 97:6,21 encompasses 12:1 encounters 57:11 encourage 70:21 encrypt 70:23 encryption 71:15 ended 83:13 85:23 91:10 endorsement 60:15,18 engage 37:5,9 engaged 52:16 58:8 98:5 enjoyed 57:1 enlighten 82:24 95:12 ensure 78:18 ensuring 90:19 entailed 42:13	entirely 33:11 34:12 35:10 entity 22:8 31:18 enunciate 86:18 equally 54:19 equipped 49:21 91:7,10 92:24 equivalent 74:23 eric 47:9 48:4 50:9 errata 2:15 102:1 103:16 erratic 66:5 errors 98:22 especially 58:7 66:13 76:13 esquire 2:2,5 103:2,20 essentially 28:20 32:17 49:25 established 90:4 et 21:6 evasive 32:13 evening 7:15 event 9:22 60:7 events 19:14 21:1,5 54:16 80:7 eventually 8:3 17:4 56:18 everybody 21:20 22:12	evidence 62:18 evolution 25:1 exact 25:3 37:19 68:6 exactly 24:6 98:1 examination 2:12 4:12 examined 4:11 example 22:3 except 22:9 102:19 exception 61:7 exceptions 20:2 excessively 62:5 exchange 86:5 exchanged 52:19 excluded 43:6 excuse 86:12 execute 18:21 executes 19:5 executive 9:6 11:17 36:22 37:13 74:10 85:19 93:12 executives 7:2 exhibited 30:8 exhibits 32:16 exist 20:22 30:19 75:16 existed 66:5 75:16 76:18 expanse 17:14	expect 26:22 expecting 36:4 experience 17:3 30:18 54:24 55:2 57:3 60:3 67:21 82:6 experienced 86:20,21 87:4 experiences 59:21 78:1 expert 72:19 90:11 expires 100:17 explain 5:9 58:18 65:13 94:15 explained 5:1 21:16 42:6,21 42:23 43:15 59:6 76:8,15,20 77:24 explaining 97:24 exposed 80:11 express 53:4 89:6,25 expressed 60:19 64:14 76:5 89:18 90:1,17 91:5 92:14 extent 4:22 11:14 16:19 17:2 19:2 21:11 21:16 23:16,25 24:10 39:1 58:9
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[extent - fully]

Page 114

68:20 69:2 71:1 86:17 99:10 extra 81:10 extremely 87:3	female 36:13,16 ferre 44:24 45:25 field 16:1 93:2 figure 26:8 48:15 fill 39:13 40:12 finance 82:4 financially 101:12 find 68:2 finding 92:21 95:3 findings 91:1 fine 50:21 finish 50:18 fire 35:12,14 63:20 70:4 78:9 fired 62:9 fires 35:12 firestorm 35:5 firing 18:8 21:19 23:17 firm 6:18 8:9,14 8:15 9:12,16 first 4:10 9:4,21 10:1 11:5,25 12:14 22:18 23:21 27:14 30:6 31:22 32:5 32:5,9,19 35:15 54:2 55:22 76:1 78:13,17 83:25 96:14	fit 85:17 five 8:23 30:21 35:12,14 77:24 78:9 87:18 95:23 floor 2:6 41:5 103:4 florida 1:16,19 2:3 100:3,17 101:3,14 103:14 103:24 flow 8:15 28:24 flowed 8:12 flown 9:12 folks 16:2 24:18 27:17 54:13 56:12 62:4 84:16 following 98:18 follows 4:11 foregoing 101:12 102:19 foremost 30:7 78:13,17 forensic 3:12 forgot 14:20 form 10:3 14:11 15:3 17:8,16 23:8 29:13 30:4 36:25 37:7,17 39:13 41:6 44:15 45:4 47:15 49:14 51:24 52:14 53:20 58:25	79:8 80:16 88:9 89:12 92:1,11 94:8,17 95:5 97:7 formal 22:11 27:19 forward 48:16 49:19 80:5 84:12 89:9 forwarded 103:16,16 found 62:7 foundational 85:14 four 30:17 38:18 frankly 59:10 59:17 61:11 62:6 65:9 84:10 91:9 frazier 73:17,22 free 44:7 friends 42:1 72:13,15,16 front 24:9 28:4 47:22 66:24 85:25 frustrated 79:18 fulfill 18:18 fulfilled 41:2 full 5:8 6:13 56:19 89:3 fully 84:9
f	f 46:1 74:3 83:21,21 faced 4:19 46:19 facing 83:10 84:12 fact 33:20 65:8 70:21 75:19 85:19 factored 47:5 fair 4:24 5:15 5:16,22,23,25 7:22 9:17 30:2 37:12 69:4 72:21 fallen 82:19 false 84:23 familiar 38:1 family 6:20 42:1 43:19 57:1 76:7 76:15,19 83:25 family's 83:23 far 46:23 65:24 fbi 39:15 fear 70:5 federal 32:11 103:14,24 feed 6:4 feel 60:3 67:4 felt 57:2 59:18		

[fundamental - hear]

Page 115

fundamental 84:7	50:22 55:1,6 59:25 65:12	gotten 65:4,20	h
fundamentally 81:12,15	66:11 79:2 85:22 89:4 90:3	government 70:24 82:6 84:8 84:15	h 2:17 74:3
funds 8:15	90:9 91:15	grab 72:4	half 50:12
further 59:15	93:15	gratification 98:4	halsema 2:9
90:2 101:10	goal 9:18	great 36:5 83:14	hand 10:14 100:10
fury 70:5	goes 17:4 27:25 39:10 60:5	greenberg 2:5 4:7 103:3	handed 45:24
future 56:11	67:25 84:7	grisham 53:23 53:24 54:5,16 56:4 63:23 64:6	handle 13:23 43:18 48:20 91:10
g	going 3:2 5:6 7:22 8:3 10:25 11:1,2,6,9 15:14 17:14 18:22,23 18:25 24:6,15 24:21,25 25:2 25:11 28:25 33:4 35:17 38:2 41:25 48:4 50:7 50:18,24 51:8 51:18 54:17 55:9 56:19,21 58:18 59:9 62:15 63:10 71:3 74:6 77:8 77:20,22 78:16 81:5 87:22 88:22 89:8 95:7 97:24 99:7,8	grisham's 55:2 96:16,18	handled 48:25 65:25 89:19
g 45:25	good 3:1 4:14 4:15 9:2 14:7 16:17 41:2 72:21,23	guess 8:6,20 11:15,16 14:24 18:7 20:10 21:15 23:5,13 26:8 27:24 28:15 34:7 37:16 38:8 39:25 41:4,18 41:19 43:2 45:2 49:7,12 51:8 59:3 61:22 71:16 78:6 82:21 90:22,24 92:7 93:5	handling 56:24 90:16
gap 46:20		guest 9:22	hangry 96:24
gate 35:21		guidelines 70:17	hanna 2:2,9
general 18:22 28:16 39:5 47:17 60:5 65:15		guys 23:12 98:11	hannity 88:13
generally 15:14 16:20 20:4,25 65:13			happen 11:5 21:1 39:20 69:19 84:18 97:25
gentleman 82:2			happened 27:24 48:12 49:12,13
getting 7:11 9:7 24:2 35:15 96:25			happens 15:21 16:4
give 5:9 56:10 56:19 87:17 95:7			harassment 36:8,19 52:13 63:12 98:1,5
given 4:17 46:14 97:8			hayes 88:15,17
gives 77:12			he'll 77:16,22
giving 69:18			head 6:2 11:8
go 3:23 6:3 7:25 9:20 20:20 22:3 22:10 29:3 32:14 46:11			headed 8:5
			health 86:4
			hear 69:1 86:24

[heard - impregnate]

Page 116

heard 3:9 heart 66:12 heck 24:15 hectic 25:4 held 55:10 helen 44:23 45:25 help 10:19 18:17 20:12 31:8,11 38:13 40:10 43:5,25 66:15 80:8 97:14 helped 14:15 61:16 helpful 57:5 89:8 97:14 helping 14:25 helps 98:25 hey 24:24 25:2 34:24 hh 100:18 hicks 25:18 38:19 67:9 94:5 94:6 hide 68:23 high 95:17 highlighted 85:16 highly 43:3 45:8 52:10 54:9 66:8 82:5 84:22,22 hill 17:2 22:3,21 38:6	hip 24:13 hire 22:7 43:24 44:8 53:6 60:2 63:20 74:11,12 75:16 93:24 hired 26:5 43:8 44:13 75:12 93:24,25 hires 57:15 hiring 18:8 21:19,24 23:17 26:4 33:13 34:14,18 43:2 54:4 73:8 hispanic 44:19 57:7 hispanics 46:2 historical 16:23 historically 20:18 85:20,24 history 16:5 20:21 61:15 64:5 hit 9:19 41:4 52:22 80:1 hits 45:21 holding 7:2 honestly 68:22 hope 14:5 25:18 38:19 50:18 65:7 94:5,6 hope's 95:25 hoping 59:7 79:4	hornik 2:5 4:7 103:3 hosted 7:15 hour 19:25 26:16 50:12 76:2 hours 21:5 25:4 26:3,6,9 58:4,11 70:3 76:11 78:7 house 8:4 12:11 13:6,11 15:2 17:6,24 18:8,16 19:21,21,23 22:2,7,13 24:1,5 24:11,13 25:12 25:15 27:22 29:7,12,15,17 29:20,25 30:11 30:20 31:1,5 32:25 33:4 35:17 37:14 38:6,25 39:2,5 39:14 40:13,14 42:6,7,11 43:3 44:2,20 45:23 53:10,19 54:12 55:25 56:12,19 58:22 59:11 61:6,7,14 65:1 66:14,17 68:8 70:11,12 73:4 73:13,19 74:5 74:20,25 75:6 76:8,9 81:6 82:23 86:7,11	86:15 89:1 91:20,22,24 93:13,20 94:16 95:4 97:19 houses 20:15 how's 77:8 hr 34:19 48:18 49:17 90:10,10 90:11,17 91:8 91:11,11 huh 40:5 huhs 6:1 human 78:20,24 79:14,23 80:7 86:4 hungry 97:1 hunt 2:2,9
			i
			i.e. 91:15 idea 48:20 57:21 identifier 38:3 image 78:18 80:3 imagine 13:13 16:1 17:5 28:13 imagined 47:16 immediate 46:19 immediately 20:6 immune 87:1 important 60:1 66:11,12 impregnate 80:12

[impregnated - jared]

Page 117

impregnated 63:16	102:3,3,4 103:6 103:6,7	34:15 61:24,25 66:8	46:7,8 49:2 68:10 73:4,16 84:15
impressed 30:15 54:5	individuals 44:23 58:8 80:9 81:24	interactions 36:17 45:18 54:6 67:3 83:4	involvement 32:20
impression 51:19	infant 41:18	interagency 86:8	involving 69:12 95:16
inaccuracies 98:22	inferior 37:6 80:13	interest 79:24	irs 32:11
inappropriate 51:13,20 52:7 66:9 80:19 98:2	inferiors 36:24	interested 54:19 101:12	island 3:4
inauguration 25:10 29:15 80:23	influx 24:2	interesting 21:25 77:24 85:6	issue 10:10 95:16
incident 30:6 62:1,13 64:19 66:6,21 94:4,6	inform 94:11	interim 19:12 31:16	issued 9:14 38:15 67:22
included 13:9	informal 27:4	interlocutor 49:18	issues 19:24 21:1 23:13 30:13 39:7 55:15 61:17 63:11 65:7 77:14 80:25 90:17 92:15
including 93:18	information 70:23	internal 22:7 86:14	ivanka 72:25 73:11 86:18
income 9:11	informed 76:4	internally 39:6	ivanka's 83:23
incoming 20:5 46:21	initiate 77:18	international 80:22	j
incorporated 3:6	input 18:1 44:10	internet 3:19	j 1:5 3:6 102:3 103:5
incorrect 29:8	inquired 76:14 76:18	interpretation 95:7	jacksonville 2:3
independent 23:2 82:10 86:4	inquiries 20:6 21:2	interviewing 27:5 62:8	january 9:7 11:18 18:3,9,20 21:18 29:11 30:22,24 33:4 37:22 39:22 47:2 63:19 97:5
index 85:9	institution 80:20	interviews 60:22 61:1,5	jared 2:5 4:6 15:4 50:20
indicated 102:20	integrity 78:13 80:4,10,14	investigation 4:22 49:2,6	
indication 46:18	intend 29:18 98:3	investigations 33:15	
individual 16:7 18:1 43:9	intended 13:21 57:22 92:9	involved 6:8 11:5 18:7 33:12	
individually 1:6 1:6,7 3:7,7,8	intentional 85:9		
	interact 16:2 48:14 88:8		
	interacted 23:6		
	interaction 4:23 12:18 14:4		

[jared - larocca]

Page 118

68:19,25 72:25 73:7,9,12 83:22 86:17 99:5 103:2 jason 21:21 22:15,16,18 24:12 25:16 27:21 34:1,8 35:17 37:12 38:15,19 40:2 40:21 46:6,8,15 60:14 63:4 71:17 72:13 77:1 79:13 80:14 93:5,6 95:21,22,25 jason's 46:25 96:2 jessica 68:12 job 5:11,13 18:2 27:4 30:11 31:8 38:12 39:11 42:3,15,15,20 42:22 43:9,11 43:18,20,23 44:5 45:21 46:2 59:14,20 60:4 61:6,9,14 65:6 66:12 68:1 74:24 82:5,18 83:11,15 87:1 97:13,19 jobs 17:6,23,23 17:24,25 18:18 30:19 40:13	42:7,12 45:22 46:11 55:1 56:1 60:2,6 75:6,16 76:8 john 2:2 4:4 103:20 jpeg 72:4 judge 5:6 judgment 43:21 45:19 59:21 65:23,24 66:3,3 66:12 67:3 68:1 77:3 78:24 july 1:12 3:3 12:17 14:6,10 16:12 100:11 101:13 102:2 103:1,5 juncture 4:8 15:17 junior 40:16 jury 5:6 k katie 33:12 keep 42:19 46:5 88:22 98:3 keeping 14:3 kids 76:16 kind 4:23 6:7,9 6:24 7:24 9:18 9:19 11:12 13:22 20:8 28:14,22 38:3 39:23 43:25 44:13 50:19	78:8 83:16 85:16 89:11 98:25 knew 24:20 25:19 26:5 27:4 47:19 63:24 68:7 96:11 know 4:20 5:21 6:6,6,7,8,8,10 6:11,24 8:4 9:18 10:11,15 11:16 12:14 13:19 17:1,3,4 18:23 19:3,8,8,8,9,10 19:17 21:7,10 21:25 24:14,17 24:17 25:11 26:3 27:16 28:11,13 29:23 30:12 31:6,7,20 31:23 32:6,9,13 33:14 34:17,18 35:21 37:18 38:4 40:19,21 41:15 42:8 44:13,18 45:5 46:15,25 47:3,4 47:12,13 49:5 50:5,9 51:7,18 52:13,18,21 53:13,17 54:19 55:2 57:18 59:4 59:12 60:1,10 60:16,23 62:6 62:16 63:4,22	64:1,4,4,5,6,16 64:17,19 65:3 65:19 67:11 68:5,7,12,15,17 68:20 69:25 71:4,5,7,9,21,22 71:24 72:24,25 73:12,23 74:5 75:8,11 76:16 76:18,24 79:1,4 79:9,19 82:6 85:22 89:21 90:11,24 91:2 93:8 95:1,10,14 96:5,12,18 98:6 knowing 72:10 82:15 92:24 knowledge 9:11 46:17 85:5,14 known 39:16 48:19 54:7 knows 69:2 kushner 72:25 l l 83:21 lack 13:1 56:15 80:13 82:17 84:7 86:18 lacked 43:21 lady 54:2 large 24:2 55:24 largely 45:21 60:4 61:10 larocca 2:5 4:6 103:3
--	--	--	--

[late - man]

Page 119

late 8:10 16:12 22:19 92:4 97:5 laura 2:3 law 12:13 32:11 70:25 lawyer 48:13,18 90:11 92:9,10 lay 66:2 lead 54:17 82:13 leader 10:22 leading 23:13 34:7 leads 54:15 leave 4:20 35:25 78:3 81:6 82:23 led 60:9 lee 1:18 3:14 100:16 101:6,17 103:18 left 81:11 83:6 83:14 88:22 legal 3:14,16 4:23 49:1,17 68:17 77:17 90:16,24 98:15 103:19 legally 4:20 length 6:7 letter 2:16 103:9 103:13 letterhead 32:15 letting 52:13 level 57:16 78:21,24 79:14 80:8 95:17	lewandowski 94:6 liaison 44:4 lieu 46:14 life 79:24 85:2 85:11 lifestyle 39:17 light 94:22 liked 56:25 57:1 83:3 limited 6:10 30:19 40:13 line 44:5 102:5 lines 71:13 lips 64:22 list 18:17,21 74:17,23 75:1,3 75:7,12 listed 32:18 96:4 lists 40:11,19 literally 57:25 little 4:25 20:8 20:14 51:8,20 53:8 56:17 92:22 96:25 lives 78:23,25 living 20:5 llc 6:16 7:6 llp 2:5 103:3 location 97:23 logistically 56:8 long 7:12 19:24 21:4 look 6:3 9:24 15:20 26:2 29:3	39:6 52:11 60:22 72:8 79:22 82:17 84:15 85:10,20 87:6 looked 81:23 looking 21:4 39:15 85:13 lose 16:14 lost 85:23 lot 4:16 10:25 13:13 17:5 20:2 20:16 27:7 48:17 60:5 61:13 68:14 84:8,12,13,13 84:14 85:11 93:18 love 16:2 27:18 70:5 75:20 lunch 87:10,11 lunchtime 50:18	mail 8:15 47:1 61:15 71:23 94:21,25 95:2,6 95:21 96:1,4 97:17 mailing 95:23 mails 13:16,18 48:19 89:17 91:4 92:13 maintain 28:17 31:18 42:24 75:3 80:8 maintained 25:9 37:23 40:11 44:9 80:19 maintaining 31:12 make 13:22 14:3 16:9 18:10 29:21 43:12 48:14 51:16 58:6 59:8 64:12 64:20 65:22 78:21,25 79:2 89:20 94:2 98:2 98:23 103:10 makers 61:8 makes 68:14 85:11 making 53:14 57:7 77:9 82:4 98:4 male 36:16 man 78:4
		m	
		m 1:10 2:2 4:9 100:6 101:7 102:2,23 103:2 103:5,20 machinations 84:10 made 22:11 29:24 46:22 48:19 59:3 61:19 64:8 65:4 65:9 89:7 96:22	

[management - moving]

Page 120

management 34:14	89:23 91:10	84:10 85:24	75:7 76:4 77:1
manigault 33:7	means 19:5	86:2 92:3	78:21 80:14
43:22	24:15	mentioning	95:22 97:22
manner 91:6	meant 14:5 24:3	96:11	miller's 23:17
manners 71:16	24:20	message 48:3	34:9 60:14 63:9
mark 63:3	meat 86:16	59:15 72:8	72:17,19 77:14
marketing 7:3	mechanism	messages 28:6,8	mind 30:11
married 36:3	42:24 70:14	29:1 47:21 97:4	62:16 86:15
37:8 80:12	91:16	messaging	mine 36:11
massive 78:16	media 7:11,12	14:16 19:5	minimum 26:9
86:9	7:14,18 19:14	78:18 82:12	minute 50:13
materials 76:10	20:6 21:2 24:2	miami 41:25	87:9
matter 3:5 18:3	24:18 25:17	42:3 53:10 66:6	minutes 20:8
34:6 44:12	35:5,10,19	66:21 76:5	87:18 96:25
matters 13:20	38:21 45:12,21	michael 6:14	misconduct
max 64:23,24	46:21 50:25	mid 16:12 55:15	63:13
mcgahn 47:17	51:4 54:6,15	middletown 3:3	misleading
48:21	57:2,7 59:9 62:5	military 22:10	84:23
mean 14:13	65:11 73:14	miller 22:15,16	mistakes 81:16
27:14 28:23	74:1 82:4,17	22:18,24 23:7,9	misunderstan...
35:6 41:19	87:23 88:2	23:19,22 24:4	61:10
46:20 48:7	95:15 98:14	25:16 27:21	moment 20:1,5
49:15 52:9	meet 9:21 22:18	28:6,10 29:2,24	21:2 61:5 79:18
57:24 58:4 59:3	23:12 93:20	34:1,4,21 35:3	moments 79:19
59:10 62:11	meetings 76:10	36:3 37:13,18	monday 3:2
63:24 69:25	member 64:24	38:15,19,24	month 80:22
71:22,24 77:23	81:13 83:24	40:2 41:21 42:2	morning 3:1
79:6,7 86:24	84:2,3 85:15	42:9 46:6,9,15	4:14,15
90:10,12 91:3	members 89:23	46:17 47:7	mother 42:19
93:22 94:25	mental 11:11	48:11 49:9 53:4	mothers 43:1
meaning 12:22	mentioned	53:11 61:16	move 49:19
20:17 22:3 25:1	23:24 29:14	63:4,11,15,20	75:20
39:7 58:16,19	35:8 38:16,19	64:23,24 67:5	moving 48:16
78:14 82:16	55:25 60:6 61:5	69:13 71:3,18	50:14,16 54:15
	67:24 83:8 84:4	72:13 73:20	

[mueller - offering]

Page 121

mueller 4:20 multiple 72:4 73:18	need 6:5 24:24 32:16 41:25 42:18 48:2 56:14 59:16,20 81:14 87:17 99:9 needed 31:17 48:22 49:17 56:17 76:6,9 needing 42:18 needs 56:15 never 16:14,14 27:6 30:1,11,15 53:7 58:21 60:19 72:16 73:10 74:1,6,14 74:14 77:10 86:15,21 88:6 88:14,18 93:16 98:5 new 1:1 2:7,7 3:10 10:19 55:14 67:19 74:11 103:4,4 newest 11:3 newman 33:8 43:22 news 72:21 80:22 newsmax 7:11 7:12,14,17 8:7 8:22 nimble 86:16 nods 6:2	noes 6:1,4 nominee 10:18 14:19 15:19,20 15:25 non 13:9 nondisclosure 13:4 normal 4:25 north 2:3 notary 1:19 100:17 note 3:17 60:1 66:11,25 noted 81:22 notes 50:19 101:9 notice 1:14 november 19:11 32:17 number 24:18 30:12,15,17,19 30:21 40:13,15 52:22 77:10 78:3,7,7,17 80:2 98:14 numbers 52:19 71:14	objection 10:3 14:11 15:3,9 17:8,16 23:8 29:13 30:4 36:9 36:25 37:7,17 41:6 44:15 47:15 49:14 52:14 53:20 58:25 79:8 80:16 92:1 94:8 94:17 95:5 97:7 observed 3:20 obtain 8:21 71:1 obvious 10:18 11:2 12:4 65:11 72:12 77:17 obviously 20:2 65:16 67:14 71:10 73:15,18 86:24 90:15 occurred 62:1 62:14 91:24 occurring 58:14 80:18 offenses 65:15 offer 6:25 7:1 16:18,20 22:11 29:16,21 32:17 43:13 97:13 offered 29:19 47:8 offering 16:15 16:22 54:3 89:11
n			
n 2:11 47:9 74:3 naive 85:15 name 3:12,25 6:13 32:7,10,13 44:24 51:18 63:2 73:17 82:2 82:12 named 12:10,11 12:12 18:16 23:25 24:5,11 24:13 35:17 74:18,20,22 names 18:17 38:2 41:1,2 naming 25:15 nanny 42:18 75:25 national 10:21 11:20,22,23 80:21 natural 77:20 naturally 77:25 nature 12:24 35:9 39:7 42:22 42:25 78:2 83:15 89:3 navy 8:24 9:5 nda 13:8 necessarily 18:4 necessary 43:17 43:18			
	o		
	o 83:21 103:2 oath 2:13 4:10 100:1 obama 85:21 object 45:4 51:24 88:9 89:12 92:11		

[offers - paper]

Page 122

offers 29:24 office 9:6 11:17 18:3,12,14 19:11,22,22,23 19:25 20:5 37:13 40:14 44:3 54:20 55:25 56:2 65:13 74:11 81:10 85:19 90:19 93:12 103:10 offices 84:11 official 19:20 23:20 37:20 70:14 80:12,14 100:10 oh 52:4 73:6,23 77:8 99:5 ohio 64:24 okay 4:24 5:23 6:1,19,22,24 7:12,17,22 8:2 8:17,20 9:2,9 10:25 11:21 12:4,19,25 13:8 13:14 14:1,7 15:7,10 17:12 18:7,11,15 19:2 19:16 20:7 21:14,21 22:15 23:1,4,12,16,21 25:20,22,25 26:10 27:9,21 27:24 28:5,8	29:6,10,23 30:2 30:24 31:8,14 31:20,22 32:14 32:23 33:7,17 33:25 34:7 35:2 36:13,21 37:5 37:12 38:8,22 39:25 41:17,22 42:4 43:13,25 45:1,16,24 46:25 47:21 49:11 50:3,6,15 50:20 51:12,12 52:18,21,24 53:8,13 55:19 57:6 59:24 60:13,17 61:3 61:21 63:4,8,15 63:19,22 64:21 64:25 65:18 66:15 67:5,10 68:5,10,25 69:6 69:16,19,21 70:19 71:10,12 74:8 75:8,18,23 82:21 83:20 84:25 86:23 87:5,15,20 91:23 93:10 94:4,25 97:17 98:7,20 99:2,13 old 85:19 omarosa 33:7 43:22 85:5	omarosa's 44:2 once 18:20 19:17 34:4 40:1 103:16 ones 69:11 ongoing 53:13 53:17 77:14 open 83:2 operate 71:9 operated 22:23 86:23 operative 22:17 31:25 opinion 16:16 53:4 58:15,20 opportunities 7:21 option 31:19 46:14 97:10 options 31:16 40:21 48:16 97:9 orange 100:4 101:4,14 order 7:25 67:15,18 68:3 99:14 ordering 99:17 103:16,16 org 45:6 85:25 organization 31:9,10 oriented 31:10 original 103:15	orlando 101:14 outburst 66:8 67:6 outcome 101:12 outgoing 20:6 outline 11:12 outreach 44:19 outright 24:19 outside 19:25 57:15 58:1 70:17 86:15 overflow 56:22 overseeing 43:10 oversight 44:8 overzealously 32:15 own 6:16 74:4 81:16 98:4 owned 22:23 <p style="text-align: center;">p</p> p.m. 1:13 26:11 98:12,16 99:23 pac 31:8,11 32:5 32:11 pacs 32:1 page 2:12,13,14 2:15,15,16 72:4 79:25 102:5 pages 1:21 72:4 72:22 102:19 paid 68:18 paper 20:17 99:8
---	--	---	---

[paperwork - planning]

Page 123

paperwork 13:13	payment 77:11	persistent 83:25	59:2 68:25 69:4
paralegal 2:9	payroll 15:22	person 16:17	69:5 79:10 81:3
45:24	16:7 97:10	36:2 39:3 40:21	88:3,11 89:15
part 55:23	pdf 72:3	40:21 54:16	92:6 93:4 94:10
59:10 60:24	peace 17:3	62:10 71:5	94:20 95:6,9
61:12 87:2	pending 41:18	84:18 90:20	97:16 98:7,21
participants	people 11:4,7	92:25	99:3,13,15,16
3:20	16:15,21,22	personal 7:6	99:18 103:20
particular 16:7	17:6 19:13 22:3	22:22 23:22	phone 28:5,17
18:12 84:22	27:5 36:1 38:2	35:3,19,23	47:25 71:10,13
particularly	40:16,20 52:13	39:18 58:5	71:14,19
29:2 36:5 94:14	56:21 59:20	78:23,23 79:24	phones 71:12
particulars 24:9	60:2 61:11 65:8	80:7	phrased 14:20
parties 3:23	70:17,21 71:13	personality	15:11
20:21 56:25	72:21 74:17,23	20:16	physical 51:12
101:10,11	79:17 82:1 84:9	personally	physically 51:9
103:16	84:14 85:17	100:7	pick 69:1
partner 8:14	86:14,25 93:18	personnel 20:3	picture 10:14
parts 17:17	93:23,25 94:1	73:5	85:14
party 17:12	98:2,6	perspective 34:9	pipeline 45:7
103:16	percent 28:23	52:12	place 3:23 98:18
pass 77:3 78:24	55:1 81:1	pertaining	placed 17:13
passage 83:20	percentage	97:21	67:15
passages 85:11	24:18	phillips 2:2,2,9	placement
85:13	performance	2:12 4:4,4,13	16:10
passed 30:13	30:16	10:24 14:23	places 11:4
passing 33:15	performing	15:12 17:11,20	plaintiff 1:3,15
63:24	81:20	23:11 29:22	2:4 48:3 96:2
past 30:14 39:16	period 9:20 10:5	30:23 36:12	plaintiff's 95:20
63:11 92:13	16:11 19:9 29:1	37:4,11,25	plan 87:12,18
paternity 69:12	33:3 47:11	41:10 44:17	plane 66:7,21
path 18:25	77:23	45:10 47:20	66:23 94:5
pause 26:18	periods 77:7	49:23 50:22	planning 29:7
	permitted 1:16	51:5,6 52:1,17	56:9 60:7 84:12
		53:22 55:5,7,13	

[plans - priorities]

Page 124

plans 82:8 platform 69:24 platforms 70:14 71:18 play 56:16 plays 16:23 please 3:17,25 6:12 20:13 29:4 51:4 55:12 76:3 88:2 99:22 102:2 103:10 pleasure 98:10 plenty 10:8 93:23 plug 56:14 point 5:7 8:14 8:17 30:2 31:15 35:5 41:24 55:17 62:15,17 67:13 89:21 94:13 97:18 pokotilow 2:10 3:12 policies 31:22 32:19 70:25 78:15 86:10 policy 19:13 21:5 32:6,10 36:16,19,23 61:8 80:25 82:11 91:20,24 political 22:17 31:25 39:7,9 58:13	politically 31:9 politico 95:10 95:12 politico's 95:11 95:24 politics 57:3 poorly 57:23 porch 58:2 porter 38:4,5,10 porter's 38:9 portion 99:9 portions 5:7 position 30:22 37:24 40:25 44:1,2 54:20,22 54:25 55:3,21 60:10 79:15 82:14 92:17 93:17 97:12 positions 20:18 40:25 43:2 55:23 61:17 80:6 81:20,23 81:25 positive 79:20 possessed 59:23 possible 9:13 12:18 potential 18:18 27:7 31:16 39:16,17 40:11 70:18 95:16 potentially 23:15	pots 17:23 power 91:18 preclude 65:16 precovid 76:12 preferred 6:4 pregnancy 41:18 pregnant 74:12 prep 86:1 preparation 13:14 prepared 26:15 presence 51:13 present 2:8 66:22 presenting 62:14 preserve 78:13 78:25 preserving 15:8 president 1:5 3:6 9:6 11:18 14:17 20:19 25:14 26:4,11 37:14 54:13 56:8,20 57:16 57:23 74:11 78:15,19 80:4,5 81:1,25 82:16 93:13 102:3 103:6 presidential 17:24 57:4 70:16	press 4:25 5:16 12:11 18:14,16 19:22,25 20:4,9 20:10,20,22,25 21:17 25:15 27:11 31:5 38:14,15,17 40:14,15 54:1,8 54:9,14,20 55:25 56:12 57:1,15 59:11 61:7,8,11,12 62:13 74:20 81:13,21 83:3 83:11,18 84:4 pressure 46:19 presumptive 10:18 pretty 81:4 83:2 85:4 previous 14:2 57:2,4 previously 38:6 47:7 55:25 71:19 81:12 prieus 1:6 3:7 48:22 102:3 103:6 principal 59:15 printed 47:25 prior 8:7 12:18 18:16 45:6 57:7 69:7 87:15 priorities 78:15 80:6
---	--	---	--

[priority - read]

Page 125

priority 78:10 78:18 80:2 privacy 79:3 80:9 privately 62:4 privy 61:19 proactively 46:18 47:8 probably 9:23 63:25 71:25 72:10 78:12 82:19 83:17,22 84:5 85:8 probe 4:20 problem 42:3 83:11 procedure 1:17 103:24,25 proceed 4:3 proceeded 31:20 process 6:9 27:1 39:2 40:1 44:11 44:11 production 7:3 professional 1:18 48:25 91:11 100:16 101:6,17 professionally 49:20 51:17,20 52:2 92:18 promised 41:21 41:21 97:3,22	promises 53:15 98:3,4 pronounceme... 21:5 80:24 82:11 86:9 89:8 proper 32:7 90:4 properly 91:7 protecting 80:3 protocol 43:2 providing 16:22 provision 13:9 public 1:19 19:15 26:5,7 44:4 58:9 64:12 67:15 83:10 89:8 100:17 publication 96:23 publicly 30:9 57:18,21 62:5 90:2 pull 85:11 purposes 1:15 1:16 6:2 20:8 28:16 32:24 pursed 64:22 pursuant 1:14 purveyor 71:8 71:21 purview 48:12 push 22:5 put 13:1 15:22 25:14 35:12 40:19 48:1	49:12 57:21 61:23 78:9 85:9 putting 55:2 80:5 q qualification 43:20 45:22 qualifications 44:9 55:21 60:7 75:17 93:21 qualified 40:20 43:9,16 45:17 60:11 62:17 82:13,18 93:15 qualifies 39:3 qualify 94:16 quality 3:18,19 quashing 78:8 79:3 quell 35:6 question 5:10 5:20,23 8:8 11:16 14:2,20 17:18 28:16 30:12 32:5 41:8 43:19 45:3,7 55:16,19,20 60:14 68:14 71:7,16 72:1 77:11 81:5 83:22,25 90:25 92:22 93:1,8 questioned 45:19	questioning 4:23 questions 4:16 4:19 5:8,13,14 5:19 10:25 11:6 11:9 12:4 18:22 18:24 20:9 72:22 83:5 98:8 quick 24:25 quiet 72:22,23 quite 6:6 quiz 77:16 quote 12:23 r r 45:25,25 46:1 46:1 47:9 74:3,3 74:3 raise 42:1 raised 49:22 92:16 raising 75:24 ran 7:5 10:7 ranging 78:7 rather 24:2,25 25:4 rationale 65:14 raton 9:23 reach 10:10 reacted 65:25 read 2:16 12:23 34:22 69:6,14 70:3 73:14 98:20,21 99:3 102:19 103:10
--	--	---	--

[reading - remember]

Page 126

reading 76:25 103:21 real 61:25 realize 79:15 realized 46:21 realizing 84:17 really 9:17 32:16 45:14 56:2 69:23 86:24 reason 30:3 59:10 84:1 102:5 reasonable 103:13 reasons 15:23 16:8 41:9 49:17 65:11 72:12 77:17 81:12 recall 13:7 16:15 27:16 34:25 35:1 41:11,17,22 46:2,24 49:24 50:8 51:14 53:10 64:11,13 64:14 68:4 72:5 72:7 75:18,23 83:12 88:4,7 94:5,23 receipt 103:13 received 7:10 47:22 63:5 95:22 103:16	recent 7:5 reception 9:25 recess 51:1 87:24 recognized 79:18 recollection 9:16 12:16 22:19 35:2 52:6 64:9 recommend 16:18 22:4 93:24 recommendati... 16:18 40:7 44:11 53:5 82:1 recommendati... 16:9 18:5,10 32:21 40:4 recommended 45:9 48:13 49:25 93:17,23 recommending 38:24 record 3:2,24 4:1 5:3 6:3,13 15:9 50:22,24 51:3 55:6,9,10 55:12 64:12 84:21 87:22,23 88:1 98:17,19 101:8 recorded 3:4,22 33:20,23 99:10	recording 3:18 3:22 recordings 33:18 records 8:10 9:13 13:12 70:11,16,18 redepose 98:24 reemployed 37:16 referee 56:16 reference 70:9 referenced 66:19 89:18 103:9 referring 95:13 95:19 96:16 reflect 35:22 82:16 reflected 57:23 regard 33:14 103:14 regarding 10:10 41:20 regardless 57:20 registered 1:18 100:16 101:6,17 regular 19:20 reid 1:18 3:15 100:16 101:6,17 103:18 reince 1:6 3:7 48:22 102:3 103:6	related 14:8 16:10 32:21 36:16 44:19 45:12 46:15 50:10 61:17 63:5,12 71:2 95:16 relationship 10:13 20:17 23:22 34:9 35:4 37:5,9 48:10 49:7,9 53:14,18 55:3 57:10 58:8 relationships 11:13 20:3,22 22:23 36:24 39:18 56:6 57:7 58:5 relative 101:10 101:11 relatively 6:9 relayed 35:3 90:2 release 26:16 38:15,17 relevant 5:7 remain 72:13,15 remember 13:12 16:21 26:22 32:4 37:23 40:12 41:19 51:19 55:16,22 67:24 68:23 69:23 70:1,2,4,9 89:3
--	---	--	---

[remembered - role]

Page 127

remembered 13:22	requested 90:5 101:8	responding 35:11	61:15,18,19 62:2 94:25 95:1
remote 76:12	requesting 47:2	response 35:10	99:7,11 101:8
rendered 8:25	requests 95:15	68:16	103:10,11,12
repeat 15:10 76:2	required 12:13 24:4 30:18	responsibilities 40:24 56:2	reviewed 13:14 41:1 72:5
report 37:2 59:9 101:7	requirements 22:11 42:11	75:17 81:22	revise 32:8
reported 1:18 94:5	requires 56:9	responsibility 14:21 34:16	revision 84:17
reporter 1:18 3:14 4:2 5:4	requisite 43:17 45:20	40:23 42:12	rhetorical 83:22
63:2 74:9 83:21	resent 59:19	43:10 62:3	rhode 3:4
84:19 95:19	resentment 58:23 59:1	responsible 21:17,18	right 9:20 11:11 15:17 16:25
98:20 99:13,19	reserves 8:24	rest 17:3	28:15,15 35:7,7
100:16 101:7,18	reset 50:13	restraining 67:15 68:3	35:20 55:1 56:1
reporter's 2:14 101:1	resign 46:9,14 47:2	result 91:21,25	62:16 66:20
reporters 56:6 57:2 58:1,6,17	resignation 46:16,16,25	results 49:5	71:10 77:18
58:18 62:20	47:8	retain 33:7 45:3	85:15 98:21,25
78:22 95:23	resignations 46:13,13	46:5 48:22	rigwil 6:16,17 6:25 7:5,8,9,19
96:1	resigned 40:2 46:18 59:10,17	49:17 50:4 57:8	7:24 8:6,16,22
reports 73:14	resigns 93:6	73:1,2	ring 73:17
representation 68:18	resolve 49:13	retained 74:17 89:6,19 90:6	rise 57:16
represented 85:5	respect 13:11 17:23 61:4 65:8	91:7 92:19	rnc 9:23 14:24 14:25 15:16,18
republican 10:20 11:20,21	respond 5:14 71:3 72:11	93:20 98:15	15:19,21,24
11:23 17:13	99:12	retaining 89:24	16:23 17:12,18
36:5	responded 31:7 72:7	retraining 67:18	17:25 23:5 25:7
request 27:19 99:8		return 50:1	25:9 46:1 60:11
		reverse 7:25 8:21	86:12
		review 5:6 13:12,18 45:16	rnc's 16:4
		57:6,10 60:22	rob 38:3,5
			role 5:18 10:22 11:21 14:8,22
			15:15,18,24
			16:13,23 19:17

[role - services]

Page 128

23:17 32:2 42:9 42:12 44:19 50:9 54:3 60:8 61:10,11,14 73:1,9 75:15 76:19 83:9,10 83:18,19 90:25 roles 34:16 40:24 81:22 84:11 roll 82:11 rolling 84:17 rollout 82:8 96:1 rollouts 21:5 60:7 80:6,25 84:13 room 5:5 41:5 51:10 rosen 2:5 4:7 103:3 rpr 103:18 ruined 59:4 rule 103:24,25 rules 1:17 103:14 rumor 86:21 run 9:15 24:21 32:1 38:25 runs 7:6 rushed 39:21	saw 12:23 saying 27:18 54:19 62:20 64:13,15 75:2 89:10 95:23 says 48:4 84:2 scale 39:23 scandal 35:19 35:23,24 scanned 95:21 scaramucci 82:2 82:3 87:6 93:19 94:1 scaramucci's 82:15 scavino 25:16 38:20 scenario 67:17 91:8 97:25 schedule 17:25 scheme 6:10 school 63:25 screaming 5:12 94:7 screen 3:21 48:2 72:3 screenshot 26:19 scroll 28:22 scrutiny 46:21 scuttle 27:7 seal 100:10 sean 1:6,10 3:5 3:6 4:9 6:14 15:5 50:3,5	68:21 88:12 100:6 101:7 102:2,3,23 103:2,5,6 seanspicer.com. 81:9 second 10:7 26:18 78:20 secondly 81:19 secretaries 40:16 secretary 12:11 18:17 20:9,10 20:20,22 21:1 25:15 27:11 31:5 38:5,14 54:1 57:15 59:11 61:7,12 74:20 81:21 83:11,19 section 11:11 security 22:6 65:4 67:22,23 73:15 76:9 86:5 see 29:3 61:16 67:17,20 79:20 93:5 seeing 88:7,8 seeking 24:19 seems 40:6 65:18 seen 61:1 selected 27:1 selection 27:22	selling 46:2 send 62:19 66:3 66:4 89:4 99:11 sending 46:3 65:24 79:6 senior 10:9 12:12 37:20 38:18 39:20 61:8 80:11 89:23 sense 22:9 42:9 55:23 65:7 sent 23:23 24:8 31:7 47:1,22 52:9 57:17 62:15 66:2 92:14 separate 54:11 60:14 september 9:8 9:10 series 22:10 24:23,24 28:1 35:8 66:10,16 66:19 67:2 71:14 serious 48:6,19 91:6 seriously 48:8 serve 64:25 66:16 served 38:5 service 9:3 services 6:25 7:1 8:25 86:4
s			
s 2:17 save 28:25			

[serving - spicer's]

Page 129

serving 65:1 set 7:19 54:10 several 23:15 27:3,17 41:8 58:10,17 66:23 84:23 sexual 36:8,19 36:24 52:13 53:14,17 63:13 98:1,4,5 sf86 39:12 64:18 shaking 10:13 share 69:16 78:1 91:3 shared 69:15 sheds 94:22 sheet 102:1 shelves 85:10 shield 79:7,11 shielded 70:15 78:21 shielding 79:4 79:13 shop 76:13 84:12 85:20 86:16,19 shops 86:13 short 6:24 25:1 shorter 87:14 shorthand 19:1 shouting 5:12 show 7:15 95:6 showed 9:24 showing 96:5	shows 95:2 shut 58:3 side 20:10 34:15 36:5 52:25 55:4 62:14 64:13 90:24 sign 2:16 103:11 103:11 signal 70:22 signature 100:15 101:17 102:25 103:23 signed 13:4,8 signing 103:22 similar 36:2 simplistic 66:2 simply 11:1 sincerely 103:17 single 42:19 43:1 66:10 sir 5:18 21:22 21:23 28:9 87:11 89:14 103:8 sit 65:5 sitting 5:5 58:1 situation 7:24 11:11 43:19 47:14 76:16,19 76:24 77:19 81:17 91:5,17 92:15 situations 36:21 56:24	six 8:23 79:25 95:23 skill 54:10 skills 43:18 sliding 39:23 small 75:24 smaller 85:21 social 25:17 38:21 77:19 sofia 44:24 45:1 solutions 3:14 3:16 98:16 103:19 somebody 9:13 22:7 27:10 29:20 37:6 43:11 44:18 51:20 54:22 58:22 60:11 62:17 65:16 77:21 79:15 91:7,15,18 92:20,23,25 95:17 somebody's 10:14 19:17 39:8,8,15 someone's 79:24 sonny 17:1,3 sorry 8:13 14:2 46:8 49:6 59:1 62:23 67:13 75:2 92:12 sort 10:13 35:20 54:7 56:15 71:6	89:5 sounds 58:23 source 62:22,24 southern 1:1 3:10 speak 22:14 29:9 49:12 92:16 speaking 16:20 20:4,25 85:24 90:20 92:8 specific 11:10 30:18 40:15 45:11 56:1 60:2 64:2 66:18 specifically 14:25 15:14 21:3 27:16 52:8 97:23 specificity 42:9 speed 50:19 spelling 74:8 spending 62:8 spent 57:25 58:13 spicer 1:6,10 3:5 3:7 4:7,9,14 6:14,15 7:16 51:7 85:11 98:8 98:14 99:12 100:7 101:8 102:2,3,23 103:2,5,6 spicer's 83:24
--	---	---	---

[spoke - supposed]

Page 130

spoke 34:21 63:1 spoken 62:21 88:18 spokesman 59:14 spot 53:19 spouse 76:21,23 spread 79:25 80:21 squeezed 85:23 staff 14:25 16:14 17:14 18:9 21:3 33:12 35:9 38:5 54:2 57:1 61:8 83:24 84:3,3,4,5 85:15 86:11 87:3 96:1 staffer 15:21 38:7 53:25 59:15 61:6 65:12 73:7 staffers 66:23 staffing 15:16 15:18 stamp 48:3 stand 51:13 88:8 standard 39:13 71:13 standards 93:21 standpoint 91:9 92:9 start 6:12	started 24:2 93:10 starts 87:12 state 1:19 3:25 6:12 100:3,17 101:3,14 stated 7:19 14:14 49:16 81:12 93:14 97:9 statement 25:15 70:20 statements 84:24 states 1:1 3:10 8:18,24 9:3,5,5 14:18 56:20 57:24 95:22 status 33:14 34:12 statute 103:14 stay 83:7 staying 97:9 steered 91:14 stems 83:16 stenographic 101:9 stenographica... 101:7 step 21:22 25:2 82:19 94:2 stephanie 53:23 53:24 stephen 1:7 3:8 102:3 103:6	stepped 34:4,8 40:22 steps 39:4 steve 95:21 stick 9:19 stood 77:7 stop 58:14 stopped 40:1 stories 58:14 story 36:5 52:25 58:2 59:12,16 59:18 74:1 79:3 81:14 83:6 95:10,13,18 straight 11:8 strategic 25:18 38:20 strategist 12:2 14:15 street 2:3,6 103:4 stressful 56:24 strike 45:2 46:6 94:11 strong 56:5 structure 20:12 structured 9:14 20:16 struggle 42:19 stuff 28:14 style 52:5 subagencies 82:10 subjecting 70:18	submit 18:18 subscribe 102:20 subsequent 66:1 subsequently 54:1 66:4 substance 34:23 substantial 98:23 substantially 87:14 successful 17:13 19:7,12 82:3 successfully 58:10 73:12 suggested 31:16 31:18 41:1 103:12 suitability 39:10 68:1 suitable 42:15 suite 7:2 summer 17:2 super 32:1,5,11 supervisors 36:23 support 16:24 42:1,23 77:5 supportive 76:21,23 77:2 supports 15:19 15:25 supposed 36:23 44:6
--	--	---	---

[supposing - think]

Page 131

supposing 24:3 sure 7:7 13:19 13:22 14:3 18:4 26:20 27:17 34:12,25 48:14 55:7 59:8 70:5 71:20 73:6 78:21,25 79:2 80:17 81:4 82:13 88:23 89:20 surprise 26:25 27:6 surrogate 12:21 21:8,11 60:5,9 60:24 61:13 82:5 surrounded 35:10 surrounding 35:16 66:5 swear 4:2 sworn 4:8,10 18:2,19 100:8	87:24 102:2 takes 56:9 86:1 talented 87:3 talk 24:24 35:20 85:3 86:13 92:10 talked 40:2 53:8 78:6 94:4 96:10 talking 50:17 51:22 62:12,14 74:25 78:14 86:2,13,17 92:13 96:13 talks 54:16 tamp 61:17 tamped 58:2 tank 31:9 tasked 92:10 tax 9:13 84:17 team 12:9,12 13:6 15:1 16:3 21:12 37:21 50:7 74:17,19 81:13 89:24 tech 55:15 71:4 technically 44:3 ted 73:24 television 7:15 12:22,23 tell 15:6 18:15 24:7 27:14 31:14 41:22 42:14 50:6 57:17 58:12 70:7,10 72:21	88:24 97:18 telling 97:22 temperament 43:20,22 ten 50:13 87:9 96:25 tenure 65:2 82:15 85:21 93:23 term 19:24 21:4 24:14 25:1 terminate 93:6 termination 46:14 terms 16:23 20:15 21:25 34:13 35:9 39:17 44:10 56:24 60:7 80:5 83:14 terrible 5:10 test 6:5 text 28:5,8,14 47:21 48:3 71:13,24 94:14 94:18 97:3,17 texts 13:16,18 28:21 29:4 31:6 thank 9:2 51:5 81:11 98:8,10 98:10 thanks 85:2 therefor 102:5 thereof 5:7 82:17	thing 8:13 35:15 50:14 52:10 58:12 65:22 67:13 76:12 77:8 95:11 96:24 things 6:10 9:14 11:5 15:25 20:4 59:10,22 60:8 70:13,22 71:9 77:6,20 78:1,12 79:17,17 think 8:5,8 9:7 14:3 16:17 19:19 20:14 24:14,23 25:1 26:7 30:17,21 31:9,11 32:23 36:4 38:13,14 40:13 41:7,8 42:14 43:15 51:16 52:4,9,15 55:24 56:1 59:23,25 61:9 63:24 65:24 66:1,20 67:3,14 68:16 70:23 71:25 74:19 75:7,11 76:1 77:25 78:9,12 78:20 79:3,14 79:23 83:2,3,10 83:12,15,16,20 84:5,6,14 85:4,8 85:22 86:1,25
t t 2:17 74:3 tab 87:5 table 27:2 take 3:23 6:6 18:25 48:1 50:7 50:13,19 54:23 56:10 76:19 80:1 81:24 taken 19:11 51:1 81:17 83:9			

[think - tweets]

Page 132

87:6,13,17 90:23 93:1,15 93:19 96:10,22 97:8 thought 40:20 41:2,21 54:9 74:4 87:15 90:3 threatened 89:4 three 7:13 11:24 30:15 40:17 78:3 98:15 throw 32:15 ticket 10:23 14:17 time 1:13 10:5 10:19,19 16:11 20:15 24:1 25:22 27:14 28:23 29:1,19 31:4 34:22 41:12 46:23 47:11 50:23 51:2 55:8,11 61:23 62:1,8 70:10 73:9 74:12 76:12 77:23 78:2,3 87:11,21,25 98:12,16 99:17 99:18 timeframe 41:14,16 68:6 timeline 13:23 25:3 26:8 28:3 31:4 61:24	times 10:8 15:20 16:16 23:15 51:7,9 65:11 77:15,19 78:4 79:14,17 81:20 title 25:17 37:19 today 3:2,3,13 3:14,15 5:18 6:7 11:1 13:15 65:5 85:4 together 25:6 40:19 61:23 77:23 84:6 told 25:14 40:23 41:24 42:2 48:21,23,24 49:16 53:18 64:10,17 75:19 ton 62:8 tone 58:14 took 57:18 59:7 62:4 66:25 98:18 top 14:16 23:19 total 98:14 touch 31:17 traditional 19:4 train 18:6 transcript 98:22 99:8,11,21 101:8,8 102:20 103:9,11,13,15 103:22 transition 12:9 12:12 13:6 15:1	19:8,14 21:12 27:10 37:21 57:24 64:8 74:17,18 75:5 90:15 91:24 92:5 travel 10:19 54:13 86:6 travelled 54:8 travelling 67:19 treat 91:6 tremendous 56:9 trial 1:15 tried 52:11 72:11 trip 56:8 trips 21:5 trouble 63:10 true 28:15 34:24 60:16 83:4 88:20 101:8 trump 1:5 2:6 3:6 6:19,19 8:3 9:19,21,22 10:2 10:9,22 11:13 12:6,9 13:5,5,6 13:10 14:10 15:1 16:9 22:12 25:14 26:11,11 27:9 29:23 37:14 45:12 46:1,2,3 50:9 51:22 52:4 53:25 54:9	56:25 57:11,14 66:24 72:18 73:1 82:25 83:1 83:7,10 85:20 88:5 102:3 103:3,5 trump's 60:18 66:7,21 truth 68:22 try 50:14 52:24 58:6 trying 8:21 9:17 11:2,3 15:13 25:5 32:4,12,15 32:19 38:1 39:25 42:19 68:16,23 78:11 81:1 84:25 85:14 87:10 89:3 92:7 93:5 95:2 96:25 97:3 97:5 turning 72:22 tweet 23:23 24:8 25:23 26:7 28:1 34:23 40:8 58:16 59:4 65:19,23,24,25 66:2,10 79:6 90:2 95:15 96:6 tweeting 62:5 tweets 28:1 30:9 34:24 46:1,3 52:9,22,25 62:15,19 66:1
--	--	--	---

[tweets - want]

Page 133

88:25 89:4 twice 78:3 two 11:24,25 16:6 17:17,23 30:12 34:17 36:1 39:4 44:23 58:8 73:25 76:16 78:12 80:9 81:11 84:6 84:11 94:7 96:22 type 6:25 typing 5:5	58:7 59:8,19 66:15 84:9 91:8 92:7 understanding 11:4,12 23:5 29:6,10 34:8 37:21 38:22,23 39:4 49:11 53:11 56:18 72:18 84:8 understood 5:24 56:15 83:12 unfortunately 38:3 unique 52:5 54:25 55:23 unit 50:25 51:4 87:23 88:2 united 1:1 3:9 8:18,24 9:3,4,5 14:18 56:20 57:23 units 98:14 unnamed 62:22 62:24 unprofessional 52:10 unqualified 60:15 82:5 untenable 81:18 update 69:18 upset 79:18 use 1:15 39:19 58:4 70:7,22	used 21:25 73:23 98:14 usually 87:12 98:25 utter 79:17 v v 102:2 103:5 varies 20:14 variety 15:22 16:8 49:16 various 7:20 19:5,6 20:15,21 81:20 82:7,9 vent 90:2 verbal 66:23 97:21 veritext 3:13,15 98:15 103:19 versus 3:5 vet 54:22 vetted 22:5 vetting 26:25 30:13 39:10 67:25 victim 52:13 video 3:4,22 98:19 99:6,17 99:18 videoconferen... 1:11 videographer 2:10 3:1,13 50:23 51:2 55:6 55:8,11 87:21 87:25 98:12	99:16 videotape 98:13 99:9 videotaped 1:10 view 58:20 83:23 violating 67:18 violation 67:19 70:24 violations 70:18 virtually 3:18 visibility 34:20 w w 7:10 9:14 83:21 wait 72:24 waiting 64:21 waive 98:20,24 99:4 103:11,21 waiver 103:21 walker 2:2,9 wall 2:6 103:4 walsh 31:24,25 32:3,18 33:12 want 5:2 7:24 14:3 15:15 16:6 17:6 20:7 29:17 32:8,12,24 56:13 58:3 59:7 59:19 64:12,15 65:22 66:9 67:10 68:15 79:7 90:18 91:3 99:3
u u 45:25 u.s. 70:14,24 86:10 uh 6:1,2 40:5 uhs 6:2 ultimately 59:17 81:25 umbrellas 25:6 unclear 89:13 undeniably 81:2 under 1:16 44:3 103:14 undersigned 100:6 understand 5:10,14,20 15:13,15 20:7 20:12 25:5 32:20 38:13 39:25 40:10 43:5,25 46:12			

[wanted - world]

Page 134

wanted 16:14 35:19 44:5 54:17 71:1 78:22 79:1 80:8 91:15,16 wanting 82:25 wants 30:10 washington 75:20,21,25 85:17 86:12 way 9:14 13:1 14:8 15:11 16:1 22:1,2,8 29:18 32:4,24 49:1 56:16 59:17 63:9 67:20 68:10 81:15 82:20 86:18 88:25 89:5,10 89:11,13,16 90:5,9 93:6 94:15 we've 5:13 55:15 71:12 week 13:21 41:15 went 26:16 54:1 63:25,25 77:23 whatsapp 70:22 whatsoever 13:9 34:3 52:6 97:18 wheelhouse 48:17	whistle 52:12 white 8:4 12:11 13:6,11 15:1 17:6,24 18:8,16 19:21,21,23 20:15 22:1,7,13 24:1,5,11,13 25:12,15 27:22 29:7,12,15,16 29:20,24 30:11 30:19 31:1,5 32:24 33:4 35:17 37:14 38:6,25 39:2,5 39:14 40:13,14 42:6,7,11 43:3 44:2,20 45:23 53:9,19 54:12 55:25 56:12,19 58:22 59:11 61:6,7,14 64:25 66:13,17 68:8 70:10,12 73:4 73:13,19 74:5 74:20,25 75:6 76:8,9 81:6 82:23 86:7,11 86:15 89:1 91:20,22,24 93:13,20 94:16 95:4 97:19 wife 36:4 63:17 win 17:10,18 35:21	wind 11:7 window 19:25 wins 17:19 wise 86:1 wish 39:24 withdrawing 53:5 witness 3:21 4:2 4:8,10 10:5 14:13 15:4,7,10 17:10,17 23:9 29:14 30:5 36:10 37:1,8,18 41:7 44:16 45:5 47:16 49:15 50:20 52:15 53:21 59:1 68:19,22 79:9 80:17 88:10 89:13 92:2,12 94:9,18 95:6 97:8 98:10 99:2 99:5 100:10 102:25 witnessed 60:10 wolff 82:22 83:13,20 wolff's 84:22 85:7 86:17 woman 44:24 won 19:10 35:13 woodward 82:22 83:13	woodward's 85:8 word 21:25 51:21 56:16 85:9 words 36:11 39:9 62:12 work 8:6,6,7 9:3 11:17,18 12:5,8 12:21 22:2 25:6 25:6 30:10 41:25 42:3 45:11,15 53:3,9 54:18 56:7 60:23 61:13,18 73:24 75:20 76:5,9,13 85:17 85:18 87:17 91:22 97:12,23 worked 9:6 11:23 17:1 42:7 45:8 78:8 84:8 working 22:20 42:11 43:2 54:24 57:1 74:10 workplace 36:17 63:12 73:22 80:19 98:2 works 22:1 72:18 world 8:3 55:14 59:8 77:22 82:4
--	--	---	--

[worry - zoom]

Page 135

worry 97:2
worthy 58:9
wrangler 54:7
write 78:22 81:7 83:7
written 6:2 36:18 64:7
wrong 17:6
wrote 59:12 81:4,19 84:1
x
x 2:11,17 40:15 70:3
y
yeah 26:18 28:7 41:7 71:25,25 73:24 74:4 75:7 79:21 80:8 84:20 85:18 88:19 95:14
year 14:18 69:20
years 7:13 8:23 9:1,5 11:24 14:3 65:15 79:16
yeses 6:1,4
york 1:1 2:7,7 3:11 10:19 67:19 103:4,4
young 76:16
z
z 74:3
zoom 6:3 55:14

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Rule 1.310

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